EPA Registration 69554-5



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

February 3, 2015

Mr. Steven R. Spaulding Senior Director, Regulator Affairs B2Z Corporation 1501 E. Woodfield Rd. Schaumburg, IL 60173

Subject:

CSF Notification per PRN 98-10 - update EPA Reg. No, registrant name and

supplier on Confidential Statement of Formula (CSF)

Product Name: Diflubenzuron Technical EPA Registration Number: 69554-5 Application Date: October 27, 2014

Decision Number: D497022

Dear Mr. Spaulding:

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the actions requested fall within the scope of PRN 98-10. The CSFs submitted with your application have been stamped "Notification" and placed in our files.

Please note that the record for this product currently contains the following CSFs:

Basic CSF dated 10/27/2014

Any CSFs other than those listed above are superseded/no longer valid. If you have any questions, please contact Linda A. DeLuise by phone at 703.305.5428, or via email at deluise.linda@epa.gov.

Sincerely,

Product Manager (10)

Invertebrate and Vertebrate Branch #2

Office of Pesticide Programs



October 27, 2014

Steven R. Spaulding

Sonice Director, Regulatory Alfairs

B2E Corporation

1501 E. Woodfield Rd Suite 200W Schaumbe a. ft. 60173

547-330-5380 utrono 547-330-5361 fair

sapanidhag@central.com

Richard Gebken, PM10

Registration Division
Document Processing Desk (NOTIF)
Office of Pesticide Programs (7505P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

SUBJECT: Notification to Update EPA Reg. No., Registrant Name and Supplier on the

Confidential Statement of Formula (CSF)

EPA Reg. No. 69554-5, Diflubenzuron Technical

(Contains Confidential Business Information)

Dear Mr. Gebken:

This formula notification for the B2E Corporation product with EPA Reg. No. 69554-5 is submitted to update the EPA Reg. No. for the product and active ingredient, and the registrant and supplier name and address, due to the transfer of registration from Raymat Materials Inc. to B2E Corporation.

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product.

Two copies of the revised basic CSF are submitted, along with one copy of the existing basic CSF, form 8570-1, and form 8570-27.

If you have any questions regarding this submission, please contact me by phone at 847-330-5330 or sspaulding@central.com.

Sincerely,

Steven R. Spaulding

Senior Director, Regulatory Affairs

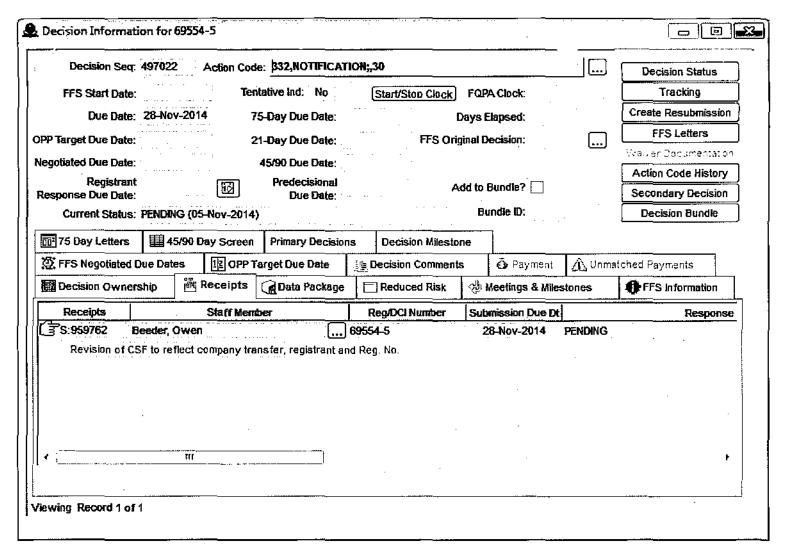
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4. Company/Product (Name)			PM#				 -	∀ [7] №	one Restricted
B2E Corporation/Diflub	enzuron Technical		10						
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Schaumburg, IL 60156			Product Name			FER	_ 3 ;	2015	
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Resubmission in respons	e to Agency letter dated		- -	'Me Too"	'Application	on			
Notification - Explain belo	w.			Other - E	xplain bel	ow.			
Explanation: Use addition	nal page(s) if necessary. (i	For section I and section	on II.}	- <u>-</u>	·		•		
registration from Raymat Material This notification is consistent with formula of this product. I understa PR Notice 98-10 and 40 CFR 152 For questions, please contact: Sta	the provisions of PR Notice 9 nd that it is a violation of 18 t .46, this product may be in vi	J.S.C. Sec. 1001 to willfu olation of FIFRA and I m	illy make any false statemen lay be subject to enforcemer	it to EPA.	I further un	idersland	that if this n	notification is no	t consistent with the terms of
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EPA Form 8570-1 (Rev. 3-94) Previous editions are obsolete.

White - EPA File Copy (original)

Yellow - Applicant copy



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Material Sent for Data Extraction

Reg. # <u>69554-5</u>
Description: Amenament
☐ Material(s) Sent to Data Extraction Contractors:
New Stamped Label Dated 6/19/14
Notification Dated
New CSFs Dated
Other:
Decision #: 492725
Other Action/Comments:
File this coversheet and attached materials in the jacket. It must be well organized and clipped together, NOT STAPLED. Then give the jacket with the coversheet and materials to staff in the Information Services Center (ISC) (Room S-4900). If a jacket is full or only available as an image please file materials in a new jacket and bring it down to the (ISC). For further information pleas call 703-605-0716.
Reviewer: <u>Jacquelyn Marchese</u>
Phone: <u>347-0559</u> Division: <u>RD/IRB</u>
Date: <u>6/19/14</u>

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

June 19, 2014

Nancy Huebl Senior Registration Specialist B2E Corporation 1501 E Woodfield Road, Suite 200W Schaumburg, IL 60173

Subject:

Label Amendment - Response to Agency Initiated Request, revision of the precautionary

statements based on revised toxicity categories

Product Name: Diflubenzuron Technical EPA Registration Number: 69554-5

Application Date: 6/10/2014 Decision Number: 492225

Dear Ms. Huebl,

The amended label referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, is acceptable.

A stamped copy of your labeling is enclosed for your records. This labeling supersedes all previously accepted labeling. The next label printing of this product must use this labeling unless subsequent changes have been approved. You must submit one (1) copy of the final printed labeling before you release the product for shipment with the new labeling. In accordance with 40 CFR 152.130(c), you may distribute or sell this product under the previously approved labeling for 18 months from the date of this letter. After 18 months, you may only distribute or sell this product if it bears this new revised labeling or subsequently approved labeling. "To distribute or sell" is defined under FIFRA section 2(gg) and its implementing regulation at 40 CFR 152.3.

Your release for shipment of the product constitutes acceptance of these conditions. If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA section 6(e). If you have any questions, please contact Jacquelyn Marchese by phone at (703) 347-0559, or via email at marchese.jacquelyn@epa.gov.

Sincerely,

Meredith F. Laws, Chief Insecticide-Rodenticide Branch

Muy Sum Oa for

Registration Division (7505P)
Office of Pesticide Programs

Date: June 19, 2014

Enciosure

DIFLUBENZURON TECHNICAL

ACTIVE INGREDIENT: OTHER INGREDIENTS: 2.54% 100.00%

KEEP OUT OF REACH OF CHILDREN **CAUTION**

Net Contents: 55 lbs (25 kg)

EPA Reg. No. 69554-5

EPA Est. No.

ACCEPTED

06/19/2014

Order the Federal Insections - Europeideand Rodenbade Aid as amended, for the pesticide registered under EPA Reg No. 69554-5

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS - CAUTION: Harmful if swallowed or absorbed through skin. Harmful if inhaled. Causes moderate eye irritation. Avoid contact with eyes, skin, or clothing. Avoid breathing spray mist. Wear long sleeved shirt and long pants, shoes, socks, and chemical-resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID	
	ntrol center or doctor immediately for treatment advice.
IF SWALLOWED	 Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
IF ON SKIN OR CLOTHING	 Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes.
IF INHALED	 Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possible.
IF IN EYES	 Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye.
	t container or label with you when calling a poison control center, or doctor, or ent. You may also contact 1-800-347-8272 for emergency medical treatment

USER SAFETY RECOMMENDATIONS:

Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet. Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment washwater. Do not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without first notifying the sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

This pesticide is for manufacturing use only. It is only to be used for the formulation into insect growth regulator products for the following uses: (a) livestock and their premises, for fly control; (b) artichokes, barley, oats, triticale, wheat, citrus, cotton, grassland, leafy brassica and turnip greens, mushrooms, peanuts, pears, peppers, rice, soybeans, stone fruit (excluding cherries), tree nuts, turf grass; (c) non-food uses; ornamentals, forestry, products for parasite control in ornamental fish ponds, aquatic non-crop sites, e.g., products for mosquito/midge control and; (d) uses for experimental purposes that in in compliance with U.S. EPA requirements.

PESTICIDE STORAGE and DISPOSAL: Do not contaminate water, food, or feed by storage or disposal. STORAGE: Store in original container in a secure, dry storage area. PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility. CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container. Offer for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into mixing equipment. Dispose of bag in a sanitary landfill, or by incineration, or if allowed by state and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

B2E Corporation warrants that this product conforms to the chemical description on the label. B2E Corporation neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, express or implied, concerning this product. To the extent consistent with applicable law, B2E Corporation's maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law, buyer and user acknowledge and assume all risks and liabilities resulting from the handling, storage and use of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

B2E Corporation 1501 East Woodfield Road 200W Schaumburg, IL 60173

Batch Code

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Mr. Steve Spaulding B2E Corporation 1501 East Woodfield Road, Suite 200 W Schaumburg, IL 60173

MAY 2 9 2014

Subject:

Agency Initiated Action: Required Label Revisions

EPA Registration Number: 69554-5 Product Name: Diflubenzuron Technical

Dear Mr. Spaulding,

After a recent review of the data on file in conjuncture with the acute toxicity profile, the Agency has decided that the acute toxicity category for the above listed product needs to be revised. The Agency now considers the acute toxicity category of Diflubenzuron Technical as a category III.

As a result of this acute toxicity profile review, and in order to ensure that the product is appropriately stewarded, the Agency requests that you submit a revised label to reflect the change in the acute toxicity category. Please submit a revised label within 30 days of the date of this letter. If you have any questions, contact Jacquelyn Marchese at (703) 347-0559 or marchese.jacquelyn@epa.gov.

Meredith F. Laws

Chief, Insecticide-Rodenticide Branch

Registration Division (7505P) Office of Pesticide Programs

B2E Corporation

1501 E Woodfield Road • Suite 200W • Schaumburg, II 60173 • USA • Phone: 847-330-5376 • Fax: 847-330-5391

June 10, 2014

Document Processing Desk (AMEND) Office of Pesticide Programs 7504P U.S. Environmental Protection Agency Room S-4900 One Potomac Yard 2777 South Crystal Drive Arlington, Virginia 22202-4501

ATTENTION: Jacquelyn Marchese

SUBJECT: LABEL AMENDMENT TO REVISE PRECAUTIONARY STATEMENTS/FIRST AID

PER MAY 29, 2014 EPA LETTER

FOR DIFLUBENZURON TECHNICAL/EPA REG. NO. 69554-5

DearJacquelyn:

Enclosed is a completed EPA Form 8570-1 and 5 copies of amended labeling for the above product. One highlighted copy has a cover sheet detailing the changes. New text is highlighted in red. This label amendment is being submitted to respond to the May 29, 2014 EPA letter explaining that the diflubenzuron technical acute toxicity profile was recently reviewed and was changed. The changes are reflected in the Precautionary Statements and First Aid. Additional minor changes were made reflecting the product EPA registration transfer.

If you have any questions or if I can provide any further assistance, please, call me directly at 847-330-5376.

Yours sincerely,

Nancy Huebl

Senior Registration Specialist

nancy Huell

nhuebl@central.com

enclosure

Please read instructions on reverse before completing Form Ap =d. OMB No. 2070-0060. Approval expires 2-28-95						
⊕ EPA	Environmenta	United States al Protection Agr ington, DC 20460	ency	×	Negistra Amendm Other	
		Application	for Pesticide - Se	ection I		
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4. Company/Product (Name) B2E Corporation/Diffube	enzuron Technical		PM# Branch Chief, Inse	cticides	- —- <u> </u>	X None Restricted
Name and Address of Appli B2E Corporation 1501 East Woodfield Roa Schaumburg, Illinois 601 Check if this is	ad, Suite 200W 173		EPA Reg. No. Product Name			th FIFRA Section 3(C)(3) omposition and labeling to:
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460



OFF 13 OF CHEMICAL 1355TF AND POLLUTION 135VENTION

Mr. Steve Spaulding B2E Corporation 1501 East Woodfield Road, Suite 200 W Schaumburg, IL 60173

MAY 2 9 2014

Subject:

Agency Initiated Action: Required Label Revisions

EPA Registration Number: 69554-5 Product Name: Diflubenzuron Technical

Dear Mr. Spaulding.

After a recent review of the data on file in conjuncture with the acute toxicity profile, the Agency has decided that the acute toxicity category for the above listed product needs to be revised. The Agency now considers the acute toxicity category of Diflubenzuron Technolal as a category III.

As a result of this acute toxicity profile review, and in order to ensure that the product is appropriately stewarded, the Agency requests that you submit a revised label to reflect the change in the acute toxicity category. Please submit a revised label within 30 days of the date of this letter. If you have any questions, contact Jacquelyn Marchese at (703) 347-0559 or marchese jacquelyn@epa.gov.

/

Meredith F. Laws

Chief, Insecticide-Rodenticide Branch

Registration Division (7505P) Office of Pesticide Programs LABELING:

ID #: DIFLUBENZURON TECHNICAL

SIGNAL WORD: CAUTION

HAZARDS TO HUMANS AND DOMESTIC ANIMALS:

Harmful if swallowed. Harmful if absorbed through skin. Harmful if inhaled. C uses moderate eye irritation. Avoid contact with eyes, skin, or clothing. Avoid breath 1g spray mist. Wear long sleeved shirt and long pants, shoes, socks and chemical resistant gloves (such as or made out of any waterproof material, selection category A).

FIRST AID:

IF SWALLOWED: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to by a poison control center or doctor. Do not give anything by mout to an unconscious person.

IF ON SKIN OR CLOTHING: Take off contaminated clothing. Rinse skin imm: fately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

IF INHALED: Move person to fresh air. If person is not breathing, call 911 or ambulance, then give artificial respiration, preferably mouth-to-mouth, if possibl: Call a poison control center or doctor for further treatment advice.

IF IN EYES: Hold eye open and rinse slowly and gently with water for 15-20 min ates. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emerger by medical treatment information.

USER SAFETY RECOMMENDATIONS:

User should wash hands before eating, drinking, chewing gum, using tobacco, or sing the toilet.

User should remove clothing/PPE immediately if pesticide gets inside. Then was thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outlide of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

Marchese, Jacquelyn

From: Nancy Hueb! < NHuebl@central.com>

Sent: Monday, June 16, 2014 5:19 PM

To: Marchese, Jacquelyn
Cc: Steve Spaulding

Subject: RE: 69554-5 EPA LABEL REVISION PER YOUR MAY 29, 2014 LETTER TO STEVE

SPAULDING FO DIFLUBENZURON TECHNICAL

Attachments: EPA amend precautions fa per epa 614.pdf; EPA amend precautions fa per epa clean

614.pdf

Jacquelyn, thanks for getting back to me. Here are revised PDFs of a hilited version (for your convenience in seeing where changes were made) and a clean copy for stamped approval. A couple of notes, this label is a one piece print and apply so yes the First Aid will appear on the front panel so I didn't add a reference sentence below CAUTION. I increased the font size on the signal word (near KOROC) based on LRM table. Hope this will be what you need. Let me know if otherwise.

Nancy Huebl 847-330-5376

From: Marchese, Jacquelyn [mailto:Marchese.Jacquelyn@epa.gov]

Sent: Monday, June 16, 2014 2:44 PM

To: Nancy Huebl Cc: Steve Spaulding

Subject: RE: 69554-5 EPA LABEL REVISION PER YOUR MAY 29, 2014 LETTER TO STEVE SPAULDING FO

DIFLUBENZURON TECHNICAL

Nancy,

Thank you for the note. As the First Aid information is very important, it is preferable to have the Poison Control Information as often as possible, however, your original submission will be fine. Thank you for bringing that to my attention. Also, after reviewing the label again this afternoon, I noticed a typo in the spelling of the word "after" in the sentence "users should remove PPE immediately *aftaer* handling this product," within the "User Safety Recommendations" section.

Thanks for your diligence in this matter. Let me know if you have any additional questions.

Jacquelyn

Jacquelyn Marchese

Entomologist

OCSPP/OPP/RD/IRB

Email: Marchese.Jacquelyn@epa.gov

Phone: (703) 347-0559

From: Nancy Huebl [mailto:NHuebl@central.com]

Sent: Monday, June 16, 2014 12:27 PM

To: Marchese, Jacquelyn **Cc:** Steve Spaulding

Subject: RE: 69554-5 EPA LABEL REVISION PER YOUR MAY 29, 2014 LETTER TO STEVE SPAULDING FO DIFLUBENZURON

TECHNICAL

Jacquelyn, I'll make your requested changes below. One thing I did want to note and I think I indicated this on the hilited label cover sheet, per PRN 2001-1 (for revising First Aid), see attached page of the PR Notice that indicates if there is a space problem, we have the option of listing "Call a poison control center..." at the top of the First Aid box instead of listing for each route of exposure. So I believe it would be acceptable the way I submitted to you, is that acceptable to you? Let me know and I'll resend with the additional changes. Thanks.

From: Marchese, Jacquelyn [mailto:Marchese.Jacquelyn@epa.gov]

Sent: Friday, June 13, 2014 12:38 PM

To: Nancy Huebl Cc: Steve Spaulding

Subject: RE: 69554-5 EPA LABEL REVISION PER YOUR MAY 29, 2014 LETTER TO STEVE SPAULDING FO

DIFLUBENZURON TECHNICAL

Hi Nancy,

Much of the label looks fine, there are a few revisions needed before we can get this approved. Please address the following:

- 1. If the First Aid section will not be on the front panel, please add the statement "See [side/back] panel for First Aid," near the CAUTION.
- 2. The font size of the signal word must be revised, the signal word should be larger than the Keep out of Reach of Children statement, in most instances. Please see pages 14 and 15 in Chapter 3 of the Label Review Manual for further guidance (http://www.epa.gov/oppfead1/labeling/lrm/chap-03.pdf).
- 3. Under the First Aid section, add the statement "Call a poison control center or doctor for treatment advice," in the If On Skin Or Clothing box, in the If Inhaled box, and in the If In Eyes box.
- 4. On page 3, in the Pesticide Storage and Disposal section please change the subheading "Container Disposal," to "Container Handling."
- 5. A batch code is needed by the Pesticide Storage and Disposal box. If you wish to print this directly on the container please ensure you leave enough room for it to fit.

That should be it. Once those changes are made, send the label electronically to me and I'll take care of the rest. Let me know if you have any questions.

Have a good weekend, Jacquelyn

Jacquelyn Marchese Entomologist OCSPP/OPP/RD/IRB

Email: Marchese.Jacquelyn@epa.gov

Phone: (703) 347-0559

From: Marchese, Jacquelyn

Sent: Tuesday, June 10, 2014 11:12 AM

To: 'Nancy Huebl'
Cc: Steve Spaulding

Subject: RE: 69554-5 EPA LABEL REVISION PER YOUR MAY 29, 2014 LETTER TO STEVE SPAULDING FO DIFLUBENZURON

TECHNICAL

Nancy,

Thank you for sending. I'll let you know if we need anything else.

Jacquelyn

Jacquelyn Marchese Entomologist OCSPP/OPP/RD/IRB

Email: Marchese.Jacquelyn@epa.gov

Phone: (703) 347-0559

From: Nancy Huebl [mailto:NHuebl@central.com]

Sent: Tuesday, June 10, 2014 11:07 AM

To: Marchese, Jacquelyn Cc: Steve Spaulding

Subject: RE: 69554-5 EPA LABEL REVISION PER YOUR MAY 29, 2014 LETTER TO STEVE SPAULDING FO DIFLUBENZURON

TECHNICAL

Jacquelyn, I have attached a PDF of my hard copy submission sent today through the EPA front end DPD for you to work on in advance of receiving hard copy submission. Let us know if we missed anything or you have any questions.

Nancy Huebl

Sr. Registration Specialist

847-330-5376

From: Marchese, Jacquelyn [mailto:Marchese,Jacquelyn@epa.qov]

Sent: Monday, June 09, 2014 7:40 AM

To: Nancy Huebl Cc: Steve Spaulding

Subject: RE: 69554-5 EPA LABEL REVISION PER YOUR MAY 29, 2014 LETTER TO STEVE SPAULDING FO

DIFLUBENZURON TECHNICAL

Nancy,

Submittal through DPD for official processing is best, however you can also email the package to me so I can start processing the revisions now.

Please let me know if you need additional help.

Thank you, Jacquelyn

Jacquelyn Marchese Entomologist OCSPP/OPP/RD/IRB

Email: Marchese Jacquelyn@epa.gov

Phone: (703) 347-0559

From: Nancy Huebl [mailto:NHuebl@central.com]

Sent: Friday, June 06, 2014 1:05 PM

To: Marchese, Jacquelyn Cc: Steve Spaulding

Subject: 69554-5 EPA LABEL REVISION PER YOUR MAY 29, 2014 LETTER TO STEVE SPAULDING FO DIFLUBENZURON

TECHNICAL

Jacquelyn, I am revising the above noted label per your May 29th letter and I do have a question. How would you prefer it submitted? Should I submit hard copies through DPD or should I complete an 8570-1 form with a brief cover letter, convert to PDF file and email to you. Please advise. Thanks, have a great weekend.

Nancy Huebl 847-330-5376

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

June 16, 2014

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MR. STEVEN R. SPAULDING B2E CORPORATION 1501 EAST WOODFIELD ROAD, SUITE 200 WEST SCHAUMBURG, IL 60173-

PRODUCT NAME: DIFLUBENZURON TECHNICAL

COMPANY NAME: B2E CORPORATION

OPP IDENTIFICATION NUMBER: EPA FILE SYMBOL: 69554-5 EPA RECEIPT DATE: 06/13/14

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 1, at (703) 308-8045.

Sincerely.

Front End Processing Staff Information Services Branch

Information Technology & Resources Management Division



Fee for Service

{953571-~

This package includes the following	for Division
New Registration● Amendment□ Studies?□ Fee Waiver?	○ AD ○ BPPD ○ RD Risk Mgr. 1
□ volpay % Reduction:	
Receipt No. S- EPA File Symbol/Reg. No. Pin-Punch Date:	953571 69554-5 6/13/2014
This item is NOT subject t	o FFS action.
Action Code: Requested: Granted: Amount Due: \$	Parent/Child Decisions:
☐ Inert Cleared for Intended Use	Uncleared Inert in Product
Reviewer: Steve Starker	Date: <u>6//6//</u>
Remarks:	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

May 21, 2013

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

MR. STEVEN R. SPAULDING B2E CORPORATION 1501 EAST WOODFIELD ROAD, SUITE 200 WEST SCHAUMBURG, IL 60173-

Dear Mr. Spaulding:

Subject: Transfer of Pesticide Registrations and Data From Company Number 270 to Company Number 69554

Pursuant to your request in your letter and transfer agreement of April 19, 2013, we have approved the transfer of the following registrations from FARNAM COMPANIES, INC., company number 270 to B2E CORPORATION, company number 69554.

The effective date of these changes is the date of this letter.

•	Old EPA	New EPA
Registered Products	Reg. No.	Reg. No.
DIFLUBENZURON TECHNICAL	270-383	69554-5

You should indicate the new company designation, new EPA Registration Number and new Establishment Number (if it has changed) on the labeling at the next printing which should occur no later than 18 months after the effective date of this transfer. After 18 months, any product released for shipment must bear the new Registration Number and Establishment Number. If you intend to use the labels which currently appear on the transferor's product after the effective date of the transfer, but within the 18 month grace period, you must maintain complete and accurate records which identify by batch number, lot number, or other suitable description the quantities of such product bearing the transferor's label. Each container or package bearing the transferor's label which is released after the effective date of product registration transfer, must be clearly and accurately marked with the batch number, lot number or other descriptive designation used to identify the product in your records.

Supplemental distribution agreements of registered products do not transfer with the Section 3 registration. It is your responsibility as the registrant to notify any and all supplemental distributors of the transferred product(s) of this transfer agreement. If you wish to enter into supplemental distribution agreements of your product(s) under this new registration, the form

"Notice of Supplemental Distribution of a Registered Pesticide Product," EPA Form 8570-5, must be submitted to the Agency for each supplemental distributorship.

You are required to contact your local EPA Regional Office to determine what effect this transfer of pesticide registrations has on the pesticide production establishment registration.

It will not be necessary to submit labeling for review if the only changes are in the company designation and the EPA Registration Number. Other changes in the product and/or labeling may require EPA review and approval prior to distribution or sale of the product containing the new registration number. In any correspondence on these products always refer to the U.S. EPA Registration Number listed above.

The transferred registration will have the same status under the Federal Insecticide, Fungicide and Rodenticide Act, as amended, 7 USC 136 et seq., as it had prior to the approval of this transfer.

When registrations are transferred from one company to a second company, all restrictions, data requirements, conditions (suspensions), and deadlines existing on the registrations are transferred with the registrations. The new company is responsible for adhering to or complying with all such restrictions, etc. on the acquired products.

With regard to deadlines, the transferee company is responsible for submitting all required data according to the schedules already established for the acquired products. Failure to do so will result in the issuance of a Notice of Intent to Suspend. Requests from transferee companies for additional time to submit, because they acquired the registration(s) after the 3(c)(2)(B) request was issued will not be granted. If a transferee company has other valid reasons for delays in the testing which were clearly outside of their control, then such requests for time extensions will be considered in accordance with the established procedures. Transfers occurring while a 3(c)(2)(B) request is being issued or during the 90-day response time are subject to the same conditions expressed above.

Registration is in no way to be construed as an endorsement or approval of these products by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with FIFRA.

Furthermore, the transfer of the subject registrations is approved under the condition that the annual maintenance fee obligation has been fully satisfied. The annual maintenance fee is based solely on the total number of active section 3 and section 24(c) registrations held by the transferor. If the annual maintenance fee has not been fully satisfied, the transferee and transferor will be notified to comply within a specified time period or the affected registrations may be canceled.

The Agency acknowledges it has received a request for data transfer dated April 19, 2013 to transfer data ownership from the transferor to the transferee. The data transfer is effective the date of this letter. After this date **B2E CORPORATION** will be considered the data owner. This action will not automatically reflect on the Data Submitters List. If you want to be added to the Data Submitters List, you must submit a request to:

Document Processing Desk (DSL)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, NW
Washington, DC 20460

By copy of this letter we are informing the transferor of these changes. If you have any questions about this transfer approval please contact Louis Vaughn at (703) 308-8114.

Sincerely,

Steve Robbins, Chief

Information Services Branch

m sto for

Information Technology & Resource Management Div. (7504P)

cc: MS. LORRI K. CHAVEZ

FARNAM COMPANIES, INC. 301 WEST OSBORN ROAD PHOENIX, AZ 85013

RE: L_270_RAD_69554_05___2013

L_270_RAD_69554_05_21_2013

APPENDIX A
Reference: 40 CFR §1152.98 (a)(3)

MRID#	Name of Study	Person and/or	Date study	Is exclusive
		Laboratory that	was submitted	use claimed?
		conducted the study	to EPA	<u> </u>
48596901	Diflubenzuron Technical:	Iain Weatherston,	Sept. 9, 2011	No
[Product Chemistry- Group A	Jibing Lin		[
]	& Physical/Chemical	Raymat Materials		
<u>. </u>	Characteristics	Inc.		·
48596902	Diflubenzuron Technical:	H. Li	Sept. 9, 2011	No
	Product Chemistry-	Nutrichem		\
	Preliminary Analysis &	Laboratory Co. Ltd.	}	
ļ	Enforcement Analytical	Jiangsu Fengshan		
	Method	Group	<u> </u>	<u> </u>
48596903	Diflubenzuron Technical:	P. Kosovskaya	Sept. 9, 2011	No
	Product Chemistry-Physical	Raymat Materials		
	Properties, UV/Visible	Inc.	}	ļ
	Absorption	PTRL West, Inc.		
48941201	Diflubenzuron Technical:	P. Kosovskaya	Sept. 18, 2012	No
)	Storage Stability and	Raymat Materials		
	Corrosion Characteristics	Inc.		
		PTRL West, Inc.	<u> </u>	

Please read instructions on reverse before com. g form.	Form Appro	ove MB No. 2070-006	O. Approvel expires 2-28-95
United States Environmental Protection Washington, DC 20460	L	Registration Amendment Other	OPP Identifier Number
Application	for Pesticide - Secti	on I	
1. Company/Product Number 87931-3	2. EPA Product Manag John Hebert	` \ _	roposed Classification
Company/Product (Name) Raymat Materials Inc. / Diflubenzuron Technical	РМ# # 7 (RD-IRB)		
5. Name and Address of Applicant (Include ZIP Code) Raymat Materials Inc., 440 Boulder Court, Suite 30 PLEASANTON, California 94566	(b)(i), my product is to:	iw. In accordance with similar or identical in co	omposition and labeling
Check if this is a new address	Product Name		
	Section - II		
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below.	Final printed 1 Agency letter "Me Too" Ap Other - Explai	plication.	arch 30, 2012
	Section - III		
Material This Product Will Be Packaged In:	Section - III		
Child-Resistant Packaging Yes No No If "Yes" No. per	Water Soluble Packaging Yes No If "Yes" No. per Package wgt container	2. Type of Container Metal Plestic Glass Paper Other (S	Specify)
3. Location of Net Contents Information 4. Size(s) Retail Lebel Container		. Location of Label Directio	ons .
6. Manner in Which Lebel is Affixed to Product Lithograp Paper glu Stenciled	oh Other o		
	Section - IV		·
1. Contact Point Complete items directly below for identification o	of individual to be contacted, if	necessary, to process this	application.)
Name Tit 1AIN WEATHERSTON Ad	tte gent for Raymat Materials Inc		e No. (Include Area Code) 4055
Certification is certify that the statements I have made on this form and all I acknowledge that any knowlingly false or misleading statement both under applicable law.	attachments thereto are true, a		6. Date Application Received (Stamped)
den Weatherst. As	Title gent for Raymat Materials Inc.		
4. Typed Name IAIN WEATHERSTON 5. I	December 3, 2	2012	

EPA Reg. No.: 87931-3

DIFLUBENZURON TECHNICAL

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If on skin

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eyes

Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue

EPA Est. No. 89660-CHN-001

rinsing.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm Pacific Time (NPIC Web site: www.npic.orst.edu for medical information.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin. or inhaled. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated before reuse.

Manufactured for:

Raymat Materials, Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566

Net Contents: 55 lbs (25 Kg)

in Accordance with PR Notice 82-2 Based on Draft Labeling Dated 3-30-12 ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment wash water. Oo not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is for manufacturing use only. It is to be used for the formulation into growth regulator products for the following uses: livestock and their premises, for fly control.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container in a secure, dry storage area.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue and into mixing equipment. Dispose of bag in a sanitary landfill, or by incineration, or if allowed State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

Raymat Materials, Inc., warrants that this product conforms to the chemical description on the label. Raymat Materials, Inc. neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, expressed or implied, concerning this product. To the extent consistent with applicable law Raymat Materials Inc's maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law buyer and user acknowledge and assume all risks and liabilities resulting from handling, sto age and of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

BATCH CODE:

DIFLUBENZURON TECHNICAL

in Accordance with PR Notice 82-2 Based on Draft Labeling Dated

ACTIVE INGREDIENT:

EPA Reg. No.: 87931-3 EPA Est. No. 89660-CHN-001

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If on skin Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

If in eves Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue

rinsing.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm Pacific Time (NPIC Web site: www.npic.orst.edu for medical information.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin, or inhaled. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated before reuse.

Manufactured for:

Raymat Materials, Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566

Net Contents: 55 lbs (25 Kg)

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment wash water. Do not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is for manufacturing use only. It is to be used for the formulation into growth regulator products for the following uses: livestock and their premises, for fly control.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container in a secure, dry storage area.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue and into mixing equipment. Dispose of bag in a sanitary landfill, or by incineration, or if allowed State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

Raymat Materials, Inc., warrants that this product conforms to the chemical description on the label. Raymat Materials, Inc. neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, expressed or implied, concerning this product. To the extent consistent with applicable law Raymat Materials Inc's maximum liability for breach or this warranty shall not exceed the purchase price of the product. To the extent consistent with amplicable law buyer and user acknowledge and assume all risks and liabilities resulting from handling, storage and of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

BATCH CODE:

Material to be added to an e-Jacket/Jacket

Reg. No. 2793/-3	
Description:	
1. □ Placement within the e-Jacket/jacket:	
□ Default: (chronological, top = newest)	
☐ File Location: (PDF page number, i.e., "before 45")	page
2. ☐ Send to Data Extraction contractors this material:	
□ Newly stamped accepted label	
□ Notification	
□ New CSF	•
Other: Completed gap re sourcement	<u> </u>
3. Attach this coversheet to the top of the material or jack must be well organized and clipped together, NOT STAPL Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).	
Reviewer's Name: Sam Semel	-
Phone: 18 305 - 5449 Division: RS	
Date: 61/24/13	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

JAN 2 4 2013

Mr. Iain Weatherston Raymat Materials Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566

Subject: Submission of Storage Stability and Corrosion Characteristics Studies

Diflubenzuron Technical EPA Reg. No. 87931-3

Your submission date: September 16, 2012

Dear Mr. Weatherston:

The Agency has received and reviewed the requested above mentioned data. The data is acceptable and your requirement for the registration of the above product is complete. Thank you for your prompt completion of the data for this section 3 registration. If there are questions call Dani Daniel at 703 305-5409 or electronically at daniel.dani@epa.gov.

Singerely,

Dani Daniel

Insecticide/Rodenticide Branch Registration Division (7504P)

4061 North 156th Drive, Goodyear, AZ 85395

lain Weatherston, Ph.D.

Director

623-535-4055/623-317-9013

E-mail: iweatherston@cox.net

John Hebert

Product Manager, Team 07 U.S. EPA – OPP - RD - IRB One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202 September 16, 2012

SUBJECT:

Application to register Diflubenzuron Technical.

Submission of storage stability and corrosion characteristics data.

COMPANY:

Raymat Materials Inc., 440 Boulder Court, Suite 300, Pleasanton,

California, 94566.

CONTACT:

Iain Weatherston [contact details as per letterhead]

PRODUCT:

Diflubenzuron Technical [87931-3]

Dear Mr. Hebert

As agent for, and on behalf of Raymat Materials Inc., I am submitting for your review and approval the subject studies in support of the Raymat Diflubenzuron Technical. registration.

With the submission of these studies all conditions detailed in your March 30, 2012 letter of issuance have been satisfied.

If you have any questions or require further information I may be contacted at iweatherston@cox.net or by telephone at 623-535-4055.

Sincerely

lain Weatherston

Consultant to Raymat Materials Inc.

Attachments:

Transmittal document

Pesticide Application Form 8570-1

Storage Stability and Corrosion Characteristics Study (3 copies)

TRANSMITTAL DOCUMENT

NAME & ADDRESS OF APPLICANT

Raymat Materials Inc. 440 Boulder Court, Suite 300 Pleasanton, California 94566

REGULATORY ACTION IN SUPPORT OF WHICH THIS PACKAGE IS SUBMITTED

APPLICATION TO REGISTER DIFLUBENZURON TECHNICAL

TRANSMITTAL DATE

September 16, 2012

LIST OF SUBMITTED MATERIAL

48941201 VOLUME 87931-G-2 Storage Stability and Corrosion Characteristics Study.

PRODUCT REGISTRATION DATE:

March 30, 2012.

COMPANY NAME

Raymat Materials Inc. 440 Boulder Court, Suite 300 Pleasanton, California 94566

COMPANY AGENT/CONTACT

lain Weatherston, Ph.D.
J&T Associates LLC

4061 N. 156th Drive, Goodyear, AZ 85395

Ain Weathere

iweatherston@cox.net

623-535-4055

AGENT SIGNATURE

September 16, 2012

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460-0001



OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

Vinux Eage

JAN 2 3 2013

MEMORANDUM:

Subject:

Storage Stability and Corrosion Characteristics

EPA Registration Number: 87931-3 Product Name: Diflubenzuron Technical

DP Barcode: 406919 Decision Number: 471959

PC Code: 108201

From:

Julie Chao, Team Reviewer

Venus Eagle, Product Manager 1 Insecticide-Rodenticide Branch

Registration Division

To:

Dani Daniel, Team Reviewer

Insecticide-Rodenticide Branch

Registration Division

Applicant:

Raymat Materials, Inc. c/o J&T Associates, LLC 4061 North 156th Drive

Goodyear, AZ 85395

FORMULATION FROM SUBJECT PRODUCT LABEL:

		% by weight
Active Ingredient:		
Diflubenzuron	***************************************	97.46%
Other Ingredients:	***************************************	2. <u>54%</u>
Total:		100.00%

BACKGROUND:

The registrant has submitted a study (MRID 48941201) which contains the results from a one year test of storage stability and corrosion characteristics (Guidelines 830.66317 and 830.6320). The study was conducted in compliance with Good Laboratory Practices (40 CFR §160).

SUMMARY OF FINDINGS:

The test material used in the study was the subject product.

To evaluate stability, the material was stored for a period of one year under ambient warehouse conditions (7°C to 31°C) in representative commercial packaging (high-density polyethylene plastic bags). Samples were analyzed at 3-month intervals for the duration of the study using high performance liquid chromatography (HPLC) with UV detection. The results, summarized in Table 1, are within the established certified limits specified on the product CSF.

Table 1: % Diff	lubenzuron at	3-Month	Intervals
-----------------	---------------	---------	-----------

Sampling Interval	% wt/wt Diflubenzuron *		
Initial	98.66		
3 months	98.29		
6 months	98.29		
9 months	98.27		
12 months	98.77		

^{*} mean concentration

To evaluate corrosion, physical evaluations of the packaging were performed at 3-month intervals for the duration of the study. No significant changes were observed for the test material or packaging over the storage interval. Container weights were also measured over the study duration. The containers showed no significant weight losses.

CONCLUSION:

The results support the conclusion that the product is stable for at least one year in ambient storage conditions, and that the product is not corrosive to commercial packaging. This submission satisfies Guidelines 830.66317 and 830.6320, and MRID 48941201 has been classified as "Acceptable."

Places read instructions on reverse before a pleting form.	Form Ar	proved. OMB No.	2070-0080. Approval expires 2-28-9		
SEPA Environmental Protecti Washington, DC 20		Registra Amenda Other	Y		
Application for Pesticide - Section I					
1. Company/Product Number 87931-3	2. EPA Product Ma John Hebert	2. EPA Product Manager John Hebert 3. Proposed Classification None Restricted			
4. Company/Product (Name) Raymat Materials Inc./ Diflubenzuron Technical	PM# 07	PM#			
5. Name and Address of Applicant (Include ZIP Code) Raymat Materials Inc., 440 Boulder Court, Suite Pleasanton, CA 94566	300, (b)(i), my product to:				
Check if this is a new address	Product Name	Product Name			
Section - II					
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below.	Final printed labels in repsonse to Agency letter dated "Me Too" Application. Other - Explain below.				
Explanation: Use additional page(s) if necessary. (For section					
Submission of Storage Stability and Corrosion Characteristics study as per the March 30, 2012 letter of issuance for the registration 87931-3					
	Section - III				
Moterial This Product Will Be Packaged In:					
Child-Resistant Peckaging Yes No * Certification must Unit Packaging Yes No. per	Water Soluble Packaging Yes No If "Yes" No. per	2. Type of	Metal Plastic Glass Paper		
be submitted Unit Packaging wgt, container	Package wgt containe	er	Other (Specify)		
3. Location of Net Contents Information 4. Size(s) Retail Container 5. Location of Label Directions Label Container					
6. Manner in Which Label is Affixed to Product					
Section - IV					
1. Contact Point (Complete items directly below for identification)	on of individual to be contacted	, if necessary, to pr	ocess this epclipation.)		
Name IAIN WEATHERSTON	Title Consultant to Raymat Materials Inc.		Telephone No. (Include Area Code) 623-535-4055		
Certificant certify that the statements I have made on this form and acknowledge that any knowlingly false or misleading stated that any knowlingly false or misleading stated that applicable law.	d all attachments thereto are tru				
ignature qui Weatherla	3. Title Consultant to Raymat Materials	i Inc.			
d Name EATHERSTON	5. Date September 16, 2012				

Material to be added to an e-Jacket/Jacket

Reg. #	87931-3	Decision #	472094
Description:	Notification - CSF	sewision_	·
☐ Mate	rial(s) Sent to Data E	Extraction C	ontractors:
	Stamped Label Date	ed	-
	Notification Dated		
	New CSF(s) Dated		
	Other:		
□ Othe	r Action/Comments:_		_
clipped together to staff in the In available as an i	eet and attached materials in the jack, NOT STAPLED. Then give the jack formation Services Center (ISC) (mage, please file materials in a nemation please call 703-605-0716.	cket with the cover Room S-4900). If	sheet and materials a jacket is full or only
Reviewer	Rita Kumar	Division:	RD
Phone	308-8291	Date:	1-16-13



Fw: CSF notification 87931-3 Rita Kumar to: iweatherston

01/16/2013 12:33 PM

From:

Rita Kumar/DC/USEPA/US

To:

iweatherston@cox.net

Dear lain: Please see attached. Unless you request that a hard copy be mailed to you, this will be considered our official transmission of this action. Please confirm that you received this.



[Untitled].pdf

Best Regards, Rita



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

JAN 16 2013

Name

Iain Weatherston

Consultant to Raymat Materials

Company

Raymat Materials, Inc.

Address

440 Boulder Court, Suite 300

Pleasanton, CA 94566

Subject:

Notification - Minor revision in confidential statement of formula; update

designation of manufacturing site

Diflubenzuron Technical

EPA Registration Number 87931-3

Date received Nov. 13, 2012

The Agency is in receipt of your Application for Pesticide Notification under Pesticide Registration Notice (PRN) 98-10, dated Nov. 8, 2012 for the product Diflubenzuron Technical; EPA Registration Number 87931-3. The Registration Division (RD) has conducted a review of this request for its applicability under PRN 98-10 and finds that the action(s) requested fall within the scope of PRN 98-10. The CSF submitted with the application has been stamped "Notification" and will be placed in our records.

If you have any questions, please call me directly at 703-308-8291.

Sincerely,

Rita Kumar

Senior Regulatory Specialist Insecticide Rodenticide Branch Registration Division (7505P) Office of Pesticide Programs

E-mail: kumar.rita@epa.gov

Rita Kumar

Please read instructions on	reverse before comp	ng form.		Form Approv	MB No.	2070-0060	0. Approval expires 2-28-95
\$EPA	Environmenta	United States Il Protection ington, DC 2046			Registra Amendr Other		OPP Identifier Number
		Applicatio	n for Pestici	de - Section	n I		
1. Company/Product Numbe 87931-3	ðr.			Product Manager Hebert	r)	oposed Classification
4. Company/Product (Name Raymat Materials Inc.		chnical	PM#	#7			
5. Name and Address of Ap	plicant (Include ZIP Co	ode)					FIFRA Section 3(c)(3)
Raymat Materials Inc Pleasanton, CA 9456		ourt Suite 30	to:	my product is si Reg. No			mposition and labeling
Check if thi	is is a new address	<u>-</u>	Produ	ct Name		OTIFIC	ATION CUIZ
			Section -	ii	J	AN 10	
Amendment - Explain Resubmission in resp Notification - Explain	ponse to Agency letter	dated	 []	Final printed lat Agency letter d "Me Too" Appli Other - Explain	lated ication.	e to	4012
Explanation: Use addition Update Box 2 of the CSF. "This notification is consister or the confidential statement further understand that if this be subject to enforcement as	ent with the provisions of l t of formula of this produ- s notification is not consi	PRN 98-10 and I uct. I understand i istent with the ter	EPA regulations at I that it is a violation orms of PRN 98-10 and 14 of FIFRA."	of 18 U.S.C. Sec. and 40 CFR 152.4	, 1001 to wilfully	make any	false statement to EPA. I
			Section - I	<u>II</u>			
1. Material This Product Will Child Resistant Resistant	· r · · · · · · · · · · · · · · · · · ·		T O-Suble E				
Child-Resistent Packaging Yes No	Unit Packaging Yes No		Water Soluble P Yes No	·	2. Type of	Metal Plastic Glass	
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per . container i	If "Yes" Package wgt	No. per container		Paper Other (S	pecify)
3. Location of Net Contents	Information Container	4. Size(s) Retai	il Container	5. [Location of Lab	el Direction	ns
6. Manner in Which Lebel is		Lithogra Paper of Stencile	aph glued ed	Other _			
			Section - I	v			
1. Contact Point /Complete	items directly below f	or identification	of individual to b	e contacted, if ne	ecessary, to pro	ocess this	a,plication.)
Name IAIN WEATHERSTON			Title Consultant to Ra	aymat Materials		Telephone 623-535-4	No. (Include Area Code) ICS5
	ements I have made on ny knowlingliy false or i law.		all attachments the				6. Date Application Received (Stamped)
2. Signature	Weadlaseld	1	3. Title Consultant to Rayri	nat Materials Inc.			
4. Typed Name IAIN WEATHERSTON		5.	5. Date Nov	vember 8, 20)12		40

J&T Associates LLC

lain Weatherston Ph.D.

Director

623-217-9013 / 623-535-4055

E-mail: iweatherston@cox.net

November 8, 2012

Notifications Coordinator **Document Processing Desk** U.S. EPA - OPP - RD One Potomac Yard. 2777 South Crystal Drive Arlington, VA 22202

SUBJECT: Notification of the change of designation of a manufacturing site.

COMPANY: Raymat Materials Inc., 440 Boulder Court, Suite 300, Pleasanton,

CA 94566

CONTACT: Iain Weatherston, Ph.D., J&T Associates LLC.

[Contact information as per letterhead]

PRODUCT: Diflubenzuron Technical [87931-3]

Dear Sir:

As agent for, and on behalf of Raymat Materials Inc., and after an e-mail exchange with John Hebert, the relevant Product Manager, I submit this letter of Notification to correct the designation of the manufacturing site for Raymat's Diflubenzuron Technical.

Please note that is not a change of the source of the material, the material is still manufactured in the same establishment however to obtain an Establishment Registration, the designation was required to be changed from

and this necessitates that the CSF on record be updated.

Attached to this cover letter are:-

Copy of the e-mail correspondence between John Hebert and myself.

- 2. A fully executed pesticide application form containing the Notification certification.
- 3. One copy of the current Confidential Statement of Formula (8570-4)
- 4. Two copies of the draft updated Confidential Statement of Formula (8570-4)

If you have any questions or require further information please do not hesitate to contact me at iweatherston@cox.net or by telephone at 623-535-4055.

Sincexely,

Iain Weatherston

Consultant to Raymat Materials Inc.

Product ingredient source information may be entitled to confidential treatment

lain Weatherston	
From: Sent: To: Cc: Subject:	Hebert.John@epamail.epa.gov Monday, November 05, 2012 8:42 PM Jain Weatherston Daniel.Dani@epamail.epa.gov Re: Query about Raymat Technical Diflubenzuron [87931-3}
production facility is <u>not</u>	nis change via notification. In your cover letter please clearly explain that the changing and that you are only clarifying box number 2 of the CSF. Also, please nail with the submission.
Regards, John	
John Hebert, PM7 Insecticide-Rodenticide Registration Division Office of Pesticide Progra 703-308-6249	
To: John Hebert/DC/USI From: "Iain Weatherstor Date: 11/05/2012 11:58 Cc: Dani Daniel/DC/USE	n" < <u>iweatherston@cox.net</u> > BAM
John:	
this could not be done un	Recently when I requested that the "site" be registered Michelle Steveson replied that less I could certify that the company owning the site Since it is not, I obtained a company number for ed a request for establishment registration with Michelle, last week. I expect the on to be granted shortly.
do this by letter of notifi	etes that the name of the producer in Box 2 of the CSF be updated. I would like to ication since it is an administrative change and does not involve the submission of echnical diflubenzuron has, is and will be made at the site, but sold to
Do you concur that I car this is not a change of s	n update the CSF by notification – there is no actual category in (PRM $98\text{-}10$) since ource.
Regards,	
Tain	

Material to be added to an e-Jacket/Jacket

	Reg. No. <u>8793/-3</u>
Descri	ption:
1. 🗆	Placement within the e-Jacket/jacket:
	□ Default: (chronological, top = newest)
	☐ File Location: (PDF page number, i.e., "before page 45")
2. 🗆	Send to Data Extraction contractors this material:
	□ Newly stamped accepted label
	□ Notification
	□ New CSF
	Other: Amended Zabel
must Then	ach this coversheet to the top of the material or jacket. It be well organized and clipped together, NOT STAPLED. give the material with this coversheet to staff in the nation Services Center (Room S-4900).
Revi	ewer's Name: <u>Jan Janiel</u>
Phor	ne: <u>703-305-5769</u> Division: <u>R</u>
Date	: 1/30/12



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLUTION PREVENTION

NOV 3 2012

Mr. Iain Weatherston Raymat Materials Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566

Subject: Amended to Expand the Uses and Amend the Directions for Use

Diflubenzuron Technical EPA Reg. No. 87931-3

Your submission date: November 2, 2012

Dear Mr. Weatherston:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable. A stamped copy is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment. If there are questions call Dani Daniel at 703 305-5409 or at daniel.dani@epa.gov.

Suicerery

John Hebert

Product Manager (07)

Insecticide/Rodenticide Branch Registration Division (7505P)

Enclosure

DIFLUBENZURON TECHNICAL

ACTIVE INGREDIENT:

Diflubenzuron (CAS# 35367-38-5)

OTHER INGREDIENTS:

97.46%

.....

2.54%

EPA Reg. No 87931-3

EPA Est.. No. XXXXX-XXX-XX

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If on skin

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eves:

Hold eye open and rinse slowly and gently with water for 15-20

minutes.

Remove contact lenses, if present, after the first five minutes, then

continue rinsing.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 am to 4:30 pm Pacific Time (NPIC Web site: www.npic.orst.edu) for medical treatment information.

PRECAUTIONARY STATEMENT HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment wash water. Do not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without first notifying the sewage treatment plant authority. For guidance contact your Static Water board or Regional Office of the EPA.

ACCEPTED NOV 3 0 2012

Raymat Materials Inc.
440 Boulder Court, Suite 300, Pleasanton, CAlbridgethe Federal Insecticide, Fungicide, and Rodenticide Act, as amended, for the pesticide registered under:

Net Contents: 55 lbs (25 Kg)

EPA. Reg. No: 8 793/-3

45

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling

This product is for manufacturing use only. It is only to be used for the formulation into insect growth regulator products for the following use (a) livestock and their premises, for fly control; (b) artichokes, barley, oats, triticale, wheat, citrus, cotton, grassland, leafy brassica and turnip greens, mushrooms, peanuts, pears, peppers, rice, soybeans, stone fruit (excluding cherries), treenuts, turfgrass; (c) non-food uses; ornamentals, forestry, products for parasite control in ornamental fish ponds, aquatic non-crop sites e.g. products for mosquito/midge control and (d) uses for experimental purposes that are in compliance with U.S. EPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal

STORAGE: Store in original container in a secure, dry storage area.

PESTICIDE DISPOSAL:: Wastes resulting from the use of this product may be disposed of

on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer

for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into mixing equipment. Dispose of bag in a sanitary landfill, or by incineration, or if allowed by State and local authorities, by

burning. If burned, stay out of smoke.

WARRANTY

Raymat Materials Inc., warrants that this product conforms to the chemical description on the label. Raymat Materials Inc., neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, express or implied, concerning this product. To the extent consistent with applicable law Raymat Materials Inc's maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law buyer and user acknowledge and assume all risks and liabilities resulting from the handling, storage and use of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

	s Inc. Diflubenzuron Registratio	1 Page 6 of 21	Print Form		
lesse reed instructions on reverse before com. ng form.	Form Ap	B No. 2070-000	80		
Environmental Protection, DC 2	tion Agency	Registration X Amendment Other	OPP Identifier Number		
Applica	tion for Pesticide - Se	ction I			
1. Company/Product Number 87391=\$ 87931-3	Z. EPA Product Ma John Heber	anager 3.	Proposed Classification		
Company/Product (Name) Raymat Materials Inc. DIFLUBENZURON TEC	CHNICAL PM# 7		None Restricted		
5. Name and Address of Applicant (Include ZIP Code) Raymat Materials Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566 Check if this is a new address 6. Expedited Review. In accordance with FIFRA (b)(i), my product is similar or identical in compositi to: EPA Reg. No. Product Name					
	Section - II				
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below.	Agency le	ted labels in response to exter dated Application. (plain below.			
Explanation: Use additional page(s) if necessary. (For section of the Direction of the Dire	ctions for Use.				
	Section - III				
1. Material This Product Will Be Packaged In: Child-Resistant Packaging Unit Packaging	Water Soluble Packaging	2. Type of Contain			
Yes* No Yes No	Yes No	Metal Ylasti Glass	t ic		
* Certification must be submitted If "Yes" No. per Unit Packaging wgt. contained	If "Yes" No. per r Package wgt contair		(Specify)		
	Retail Container Ib (25 Kg)	5. Location of Label Direction On Label On Labeling according	ctions ompanying product		
5. Manner in Which Label is Affixed to Product Lith Pap Ste	ograph Other of the Control of the C				
	Section - IV				
1. Contact Point (Complete items directly below for identification)	tion of individual to be contacte	d, if necessary, to process to	his application.)		
			one No. (Include Area Code) 3-535-4055		
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or (Stamped) both under applicable law.					
2. Signature	3. Title Consultant to Rayma	t Materials Inc.			
4. Typed Name	5. Date	· · · · · · · · · · · · · · · · · · ·	7		
IAIN WEATHERSTON	November 2, 2012				



Form Approved OMB Nos. 2070-0060; 2070-0057; 2070-0107; 2070-0122; 2070-0164



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

\					
Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.					
Certification with Respect to C	Citation of Data				
Applicant's/Registrant's Name, Address, and Telephone Number Raymat Materials Inc., 440 Boulder Court, Suite 300, Pleasanton, CA 94586, 623-535-4	055 (Agent)	EPA Registration Number/File Symbol 87391-3 87931-3			
Active Ingredient(s) and/or representative test compound(s) Diflubenzuron [108201]		November 2, 2012			
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158 Terrestrial Food, Feed and Non-Food; Aquatic Non-Fo		Product Name DIFLUBENZURON TECHNICAL			
NOTE: If your product is a 100% repackaging of another purchased EPA-registers submit this form. You must submit the Formulator's Exemption Statement (EPA Form		r all the same uses on your label, you do not need to			
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	nt offers of compensation (the Data Matrix form should			
SECTION I: METHOD OF DATA SUPP	ORT (Check one me	ethod only)			
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). I am using the cite-all method of support (or cite-all option under the selective method), and have included with this form completed list of data requirements (the Data Matrix form musused).					
SECTION II: GENERAL	OFFER TO PAY				
[Required if using the cite-all method or when using the cite-all option under the selec	·				
SECTION III: CERT	FICATION				
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.					
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, tha	at I am the original data submitter or that I have obtained)			
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.					
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.					
I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowledgy false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					
Signature Date Typed or Printed Name and Title Nov 2, 2012 fain Weatherston, Agent to Raymat Materials					

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

	DATA	A MATRIX				
Date November 2, 201	2		EPA Reg No /File Symbol 87931-3	3	Page 1xt 4	
Applicant's/Registrant's Name & Ad	dress		Product			
Raymat Materials Inc.,	440 Boulder Court, Suite 300, Pleasanton, G	CA 94566	DIFLUBENZURON TECHNICAL			
ingredient Diffubenzuron			<u> </u>			
Guideline Reference Number	Guideline Study Namo	MRID Number	Submitter	Status	Note	
830.1550	Product identity and composition	48596901	Raymat Materials Inc.	Own		
830.1600	Description of starting materials used to produce product	48596901	Raymat Materials Inc.	Own		
830.1620	Description of production process	48596901	Raymat Materials Inc.	Own		
830.1670	Discussion of formation of impurities	48596901	Raymat Materials Inc.	Own		
830.1700_	Preliminary analysis	48596902	Raymat Materials inc.	Per		
830.1750	Certified limits	48596901	Raymat Materials Inc.	Own		
830.1800	Enforcement analytical method	48596902	Raymat Materials Inc.	Per		
830.6302	Color	48596901	Raymat Materials Inc.	Own		
830.6303	Physical state	48596901	Raymat Materials Inc.	Own		
830,6304	Odar	48596901	Raymat Materials Inc.	Оwл		
830.6313	Stability to temperature and metals, metal ions	48596901	Raymat Materials Inc.	Омл	ļ	
830.6314	Oxidation/reduction - chemical compatibility	48596901	Raymat Materials (nc.	Own		
830.6315	Flammability	48596901	Raymat Materials Inc.	Own		
830,6316	Explodability	48596901	Raymat Materials Inc.	Own		
830.6317	Storage stability	48941201	Raymat Materials Inc.	Own		
Signature	an Weatherta		Name and Title Lain Weatherston, Consultant to	Raymat Materia	Date S Nov 2, 20	

EPA Form 8570-35 (9-97) Electronic and Pappy varsions available. Submit only Paper version



(2)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities, including time for reading the instructions and completing the necessary forms. Sond comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to. Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20480. Do not send the form to this address

	DATA	MATRIX					
Date November 2, 2012			EPA Reg No./File Symbol 87931-3	Page 201 4			
Applicant's/Registrant's Name & Ad			Product				
Raymat Materials Inc.,	440 Boulder Court, Suite 300, Pleasanton, (CA 94566	DIFLUBENZURON TECH	INICAL			
Ingredent Diflubenzuron	[108201]		, –				
Guideline Reference Number	Guideline Study Name	MRIO Number	Submitter	Status	Note		
830.6319	Miscibility	48596901	Raymat Materials Inc.	Own			
830.6320	Corrosion characteristics	48941201	Raymat Materials Inc.	Own			
830.6321	Dielectric breakdown constant	48596901	Raymat Materials Inc.	Own			
830.7000	pH	48596901	Raymat Materials Inc.	Own	<u> </u>		
830.7050	UV/Visible absorption	48596903	Raymat Materials Inc.	Own			
830.7100	Viscosity	48596901	Raymat Materials Inc.	Own			
830.7200	Melting point/range	48596901	Raymat Materials Inc.	Own			
830.7220	Boiling point/range	48596901	Raymat Materials Inc.	Own			
830.7300	Density, relative density, specific gravity	48596901	Raymat Materials Inc.	Qwn			
830.7370	Dissociation constant	48596901	Raymat Materials Inc.	Own			
830.7520	Particle size, fiber length & diameter distribution	48596901	Baymat Materials Inc.	Own_			
830.7550/7560/7570	Partition coefficient	48596901	Raymat Materials Inc.	Own			
830.7854/7860	Water solubility	48596901	Raymat Materials Inc.	Оул			
830.7950	Vapor gressure	48596901	Raymat Materials Inc.	Own			
(<u> </u>					
Signature	Jun Wentler		Name and Tate fain Weatherston, Consultant to	n Raymat Materia	Date Is Nov 2, 20		

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Form Approved OM9 No. 2070-0060

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to. Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

	DATA	MATRIX				
Date November 2, 2012		EPA Reg No./File Symbol 87931-3	Page 3x 4			
Applicant's/Registrent's Namo & Add	ress		Product			
Raymat Materials Inc.,	440 Boulder Court, Suite 300, Pleasanton,	CA 94566	DIFLUBENZURON TECHNICA	L		
Ingredient Difflubenzuron	[108201]					
Guidelina Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note	
	GENERIC REQUIREMENTS		"CITE-ALL" METHOD OF DATA SUPPORT			
COMPANY NUMBER	COMPANY NAME		ADDRESS, CITY	STATE	ZIP	
270	FARNAM COMPANIES INC.		301 West Osborn Road, Phoenix	AZ	85013	
352	E.I. DU PONT DE NEMOURS & CO., INC.		1007 Market Street, Wilmington	DE	19898	
400	CHEMTURA CORPORATION		199 Benson Road, Middlebury	CT	06749	
499	WHITMIRE MICROGEN RESEARCH LABORATORY		3568 Tree Court Ind. Blvd, St. Louis	МО	63122	
2724	WELLMARK INTERNATIONAL		1501 E. Woodfield Road #200W, Schaumbe	rg IL	60173	
2749	ACETO AGRICULTURAL CHEMICALS CORP		4 Tri Harbor Court, Port Washington	NY	11050	
4389	PACIFIC CHEMICAL DIV PACE NATL CORP		500 7th Ave S, Kirkland	WA	98033	
4691	BOEHRINGER INGLEHEIM VETMEDICA INC		POB 338, 520 S 15th Street, Elwood	KS	66024	
8709	MARS FISHCARE NORTH AMERICA, INC.		POB 1014, 102.5 South Chauncey St			
			Columbia City	IN.	46725	
46946	THE AGRICULTURE & NUTRITION COMPANY		5220 Speaker Road, Kansas City	KS	66106	
61483	KMG-BERNUTH, INC.		9555 W. Sam Houston Pkwy S. #600. Hous	ton TX	77099	
66607	SPRAY DRIFT TASK FORCE		1900 K Street NW, Washington	DC	20006	
Signature	your Weathank		Name and Title lain Weatherston, Consultant to Raym	nat Material:	Date Nov 2, 2013	

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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	DA	XIRTAM AT			
Dato November 2, 2012		EPA Reg No /Frie Symbol 87931-3	Page 4xf 4		
Applicant's/Registrant's Name & Address Raymat Materials Inc., 440 Boulder Court, Suite 300, Pleasanton, CA 94566		Product			
		DIFLUBENZURON TECHNICAL			
ngrodient Diffubenzuror	n [108201]				
Guideline Reference Number	Guideline Study Name	MRIO Number	Submitter	Status	Note
	GENERIC REQUIREMENTS		"CITE-ALL" METHOD OF DATA SUPPORT		
71754	DUTDOOR RESIDENTIAL EXPOSURE TASK	FORCE	1350 i Street NW. Washington	DC	20005
71755	AGRICULTURAL REENTRY TASK FORCE		1350 Street NW, Washington	DC	20005
73766	INNOVATIVE PEST CONTROL PRODUCTS		PO Box 680216, Boca Raton	FL	33488
73989	FIFRA ENDANGERED SPECIES TASK FORCE		1350 Street NW, Washington	DC	20005
75234	AGRICULTURAL HANDLERS EXPOSURE TASK FO	RQE	POB 509, 1720 Prospect Drive,		
			Macon	MQ	63552
75313	HOMEGUARD DISTRIBUTORS INC.		12597 Ulmerton Road, Largo	FL	33774
85678	REDEAGLE INTERNATIONAL LLC		POS 640. Hockessin	DE	19707
85905	CHAMPION FARMOQUIMICO LTDA		4061 N 156th Drive, Goodyear	AZ	85395
Signature	Jan Weather	٠.	Name and Title Iain Weatherston, Consultant to Rayn	nat Materia	Date Nov 2, 2

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version

Please read instructions on reverse before comp. 1 form.		Form App	rovec	MB No. 20	70-0060	Approvel expires 2-28-95
United States FINAL Environmental Protect Washington, DC 2	tion Agency	1	<u> </u>	legistrati Imendm Other	i	OPP Identifier Number
Applicat	ion for Pes	ticide - Sec	tion l			
1. Company/Product Number -89931-3 41931-3		EPA Product Man hn Hebert	ager		J	posed Classification
4. Company/Product (Name) Raymat Materials Inc. / DIFLUBENZURON TECHNI	CAL PM	# #7				
5. Name and Address of Applicant (Include ZIP Code)	I	•				FIFRA Section 3(c)(3)
Raymat Materials Inc., 440 Boulder Court, Suite Pleasanton, CA 94566.	to:					nposition and labeling
Check if this is a new address	ĺ Pi	roduct Name				•
	Section					
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below.		Agency lett "Me Too" A Other - Expl	er dated Applicatio	on.	:0	
Explanation: Use additional page(s) if necessary. (For section I and Section !!.)						
Re-submission of final printed label for the Raymat Materials Inc., on the labels previously submitted.	, DIFLUBENZUR	ON TECHNICAL be	ecause th	iere may be a	an error ir	n the registration number
	**	1				6
	Section	- 111	,			
1, Material This Product Will Be Packaged In:						
Child-Resistant Packaging Unit Packaging	Water Solu	bio Peckaging	2	. Type of Co	ontainer	
Yes Yes No	Yes No	•			Metal Plastic Glass	
* Certification must Unit Packaging wgt. No. per Container	If "Yes" Package w	No. per gt container			Paper Other (Sp	pecify)
	eteil Conteiner		5. Locat	ion of Label	Direction	ns .
6. Manner in Which Label is Affixed to Product Pape	ograph or glued sciled	Other	<u> </u>			
Sten	Section	- IV				
1. Contact Point (Complete items directly below for identification			if necess	ery, to proc	ass this i	englication I
Name IAIN WEATHERSTON	Title	RAYMAT MATER	-	Te		flo. (include Area Code)
Certific I certify that the statements I have made on this form an I acknowledge that any knowlingly false or misleading s both under applicable law.	nd all attachment				iete.	6. Date Application Received (Stamped)
2. Signature Weather.	3. Title AGENT TO R	AYMAT MATERIAI	LS INC.			
4. Typed Name IAIN WEATHERSTON	5, Date	JUNE 11, 20	12			

RAYMAT MATERIALS, INC.

DIFLUBENZURON TECHNICALIN Accordance with PR Notice 82-2 Based on Draft Labeling Dated MAR. 30/32 EN

ACTIVE INGREDIENT: Diflubenzuron (CAS# 35367-38-5)......97.46%

INERT INGREDIENTS:2.54%

EPA Reg. No.: 87931-3 EPA Est. No. 84574-CHN-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If on skin Take off contaminated clothing.

> Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eves Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm Pacific Time (NPIC Web site: www.npic.orst.edu for medical information.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin, or inhaled. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated before reuse.

Manufactured for:

Raymat Materials, Inc. 130 Duulder Court, Suite 300 ?leasanton, CA 94566

Net Contents: 55 lbs (25 Kg)

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment wash water. Do not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is for manufacturing use only, it is to be used for the formulation into growth regulator products for the following uses: livestock and their premises, for fly control.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container in a secure, dry storage area.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue and into mixing equipment. Dispose of bag in a sanitary landfill, or by incineration, or if allowed State and local authorities, by burning. If burned, stay out of smoke,

WARRANTY

Raymat Materials, Inc., warrants that this product conforms to the chemical description on the label. Raymat Materials, Inc. neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, expressed or implied, concerning this product. To the extent consistent with applicable law Raymat Materials Inc's maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law buyer and user acknowledge and assume all risks and liabilities resulting from handling. storage and of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

BATCH CODE:

In Accordance with PR Notice 82-2 Based on Draft Labeling Dated

RAYMAT MATERIALS, INC.

DIFLUBENZURON TECHNICAL

ACTIVE INGREDIENT:

EPA Reg. No.: 87931-3

EPA Est. No. 84574-CHN-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If on skin

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eyes

Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue

rinsing.

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HOT LINE NUMBER

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PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin. or inhaled. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated before reuse.

Manufactured for:

Raymat Materials, Inc. 440 Boulder Court, Suite 300 Pleasunton, CA \$4560

Met Concents: 55 lbs (25 Kg)

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment wash water. Do not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is for manufacturing use only. It is to be used for the formulation into growth regulator products for the following uses: livestock and their premises, for fly control.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container in a secure, dry storage area.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue and into mixing equipmant. Dispose of bag in a sanitary landfill, or by incineration, or if allowed State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

Raymat Materials, Inc., warrants that this product conforms to the chemical description on the label. Raymat Materials, Inc. neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, expressed or implied, concerning this product. To the extent consistent with applicable law Raymat Materials Inc's maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law buyer and user acknowledge and assume all risks and liabilities resulting from handling, storage and of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

BATCH CODE:

NOT REVIEWED
In Accordance with PR Notice 82-2
Based on Draft Labeling Dated

Please read instructions on reverse before con ing form.	Form Approved.	//B No. 2070-0060	Print Form			
United States Environmental Protection Washington, DC 20460	* ' 	Registration Amendment Other	OPP Identifier Number			
Application	for Pesticide - Section	<u> </u>				
1. Company/Product Number 87391-3	2. EPA Product Manager JOHN HEBERT	· · · · · · · · · · · · · · · · · · ·	posed Classification			
4. Company/Product (Name) RAYMAT MATERIALS INC. / DIFLUBENZURON TECHNICAL	PM# 07		None Restricted			
5. Name and Address of Applicant (Include ZIP Code) RAYMAT MATERIALS INC., 440 BOULDER COURT, SUITE 300, PLEASANTON, CA 94566	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No.					
Check if this is a new address	Product Name					
	Section - II					
Amendment - Explain below. Resubmission in response to Agency letter dated Notification - Explain below.	X Final printed label Agency letter date "Me Too" Applice Other - Explain be	idtion.	3CH 30, 2012			
Explanation: Use additional page(s) if necessary. (For section I and Section II.)						
	Section - III					
1. Material This Product Will Be Packaged in:						
	Water Soluble Packaging	2. Type of Container				
Yes No No	Yes No	Metal Plestic				
# Constitution must If "Yes" No. per	If "Yes" No. per Package wgt container	Glass Paper Other (S	pecify)			
3. Location of Net Contents Information 4. Size(s) Retail	Container 5. Loc	cation of Label Directio	ns			
Label Container		On Label On Labeling accom	panying product			
6. Manner in Which Label is Affixed to Product Paper gliv Stenciled	h Other	· · · · · · · · · · · · · · · · · · ·				
	Section - IV					
1. Contact Point (Complete items directly below for identification of	of individual to be contacted, if nec	essary, to process this	application.)			
Name Tit lain Weatherston A	tie uthorized Agent, Raymat	Telephone 623-535	No. (Include Area Code) -4055			
Certificatio I certify that the statements I have made on this form and all I acknowledge that any knowingly false or misleading statement both under applicable law.	attachments thereto are true, accu	uste and complete. oprisonment or	6. Data Application Received (Stamped)			
Mu lika Manda	Title uthorized Agent, Raymat Mater	ials Inc.				
4. Typed Name 5. I	Date					
lain Weatherston April 10, 2012						

DIFLUBENZURON TECHNICAL

ACTIVE INGREDIENT:

INERT INGREDIENTS:2.54%

EPA Reg. No.: 87391-3

EPA Est. No. 84574-CHN-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If on skin Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes.

Call a poison control center or doctor for treatment advice.

If in eyes Hold eye open and rinse slowly and gently with water for 15-20

minutes.

Remove contact lenses, if present, after the first 5 minutes, then

continue rinsing.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm Pacific Time (NPIC Web site: www.npic.orst.edu for medical information.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin. or inhaled. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated before reuse.

Manufactured for:

Raymat Materials, Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566

Net Contents: 55 lbs (25 Kg)

ENVIRONMENTAL HAZARUS

The pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment to not discharge effluent containing this product into any body of water unless the product is Wer statems without previously notifying the local sewage treatment plant authority. For guidance, your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of red age law to use this product in a manner inconsistent with its labeling.

This product is for manufacturing use only. It is to be used for the formulation into growth regulator products for the following uses: livestock and their premises, for fly control.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container in a secure, dry storage area.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue and into mixing equipment. Dispose of bag in a sanitary landfill, or by incineration, or if allowed State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

Raymat Materials, Inc., warrants that this product conforms to the chemical description on the label. Raymat Materials, Inc. neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, expressed or implied, concerning this product. To the extent consistent with applicable law Raymat Materials Inc's maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law buyer and user acknowledge and assume all risks and liabilities resulting from handling, storage and of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

EATCH CODE:

DIFLUBENZURON TECHNICAL

ACTIVE INGREDIENT:	
Diflubenzuron (CAS# 35367-38-5)	97.469
INERT INGREDIENTS:	2.549

EPA Reg. No.: 87391-3 EPA Est, No. 84574-CHN-1

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If on skin

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eyes

Hold eye open and rinse slowly and gently with water for 15-20

minutes.

Remove contact lenses, if present, after the first 5 minutes, then

continue rinsing.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm Pacific Time (NPIC Web site: www.npic.orst.edu for medical information.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin. or Inhaled. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated before reuse.

Manufactured for:

Raymat Materials, Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566

Net Contents: 55 lbs (25 Kg)

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment wash water. Do not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is for manufacturing use only. It is to be used for the formulation into growth regulator products for the following uses: livestock and their premises, for fly control.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container in a secure, dry storage area.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue and into mixing equipment. Dispose of bag in a sanitary landfill, or by incineration, or if allowed State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

Raymat Materials, Inc., warrants that this product conforms to the chemical description on the label-Raymat Materials, Inc. neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, expressed or implied, concerning this product. To the extent consistent with applicable law Raymat Materials Inc's maximum liability for breach of this viarranty shall not exceed the purchase price of the product. To the extent consistent with applicable law huyer and user acknowledge and assume all risks and liabilities resulting from handling, storage and of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

BATCH CODE:

Material to be added to an e-Jacket/Jacket

	Reg. No. 8793/-3							
Descri	ption:							
1. 🗆	Placement within the e-Jacket/jacket:							
	□ Default: (chronological, top = newest)							
	□ File Location: (PDF page number, i.e., "before page 45")							
-								
2. 🗆	Send to Data Extraction contractors this material:							
	Newly stamped accepted label							
	□ Notification							
	□ New CSF							
	□ Other:							
must Then	ach this coversheet to the top of the material or jacket. It be well organized and clipped together, NOT STAPLED. give the material with this coversheet to staff in the nation Services Center (Room S-4900).							
Revi	ewer's Name: Sani Sanil							
	ne: <u>713 315-5409</u> Division: <u>R</u> d							
Date	: 3/30/20/2							



U.S. ENVIRONMENTAL PROTECTION AGENCY

Office of Pesticide Programs Registration Division (7505P) Ariel Rios Building 1200 Pennsylvania Ave., NW Washington, D.C. 20460

EPA Reg. Number:	
87031_3	

Date of Issuance:

Term of Issuance:

Unconditional

Name of Pesticide Product:

Diflubenzuron Technical

x Registration

Reregistration
(under FIFRA, as amended)

NOTICE OF PESTICIDE:

Name and Address of Registrant (include ZIP Code):

Iain Weatherston, Ph.D.

J&T Associates LLC

4061 N. 156th Drive

Goodyear, AZ 85395

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act.

Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is unconditionally registered in accordance with FIFRA sec. 3(c)5. Once a pesticide is registered, however, it is not regarded as permanently acceptable. Registration does not eliminate the need for continual reassessment of pesticides. If the Agency determines that, at any time, additional data are required to maintain in effect an existing registration, the Agency will require submission of such data under FIFRA section (3)(c)(2)(B).

1. Revise the EPA Registration Number to read, EPA No. "87931-3".

Signature of Approving Official:

John/Hebert

Prøduct Manager 07

Insecticide-Rodenticide Branch Registration Division (7504P) Date:

MAR 3 0 2012

EPA Form 8:570-6

- 2. Within eighteen months, of the date of this registration, submit to the Agency the required one year storage stability study (830.6317) for the proposed product under warehouse conditions. The corrosion characteristics study (830.6320) may be carried out concurrently.
- 3. Fer 40 CFR 156.10(a)(6), submit one copy of your final printed labeling before you release the product for shipment. As defined in 40 CFR 152.3, "final printed labeling" means the "label or labeling of the product when distributed or sold." Clearly legible reproductions or photo reductions will be accepted for unusual labels. Note that a clean copy of the master label in most cases does not meet the definition of final printed labeling.

A stamped copy of the label is enclosed for your records. If you have any questions regarding this notice contact Dani Daniel at 703-305-5409 or electronically at daniel.dani@epa.gov.

DIFLUBENZURONTECHNICAL

ACTIVE INGREDIENT:

Diflubenzuron (CAS# 35367-38-5)

OTHER INGREDIENTS:

97.46% 2.54%

EPA Reg. No 87391-G

EPA Est., No. XXXXX-XXX-XXX

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If on skin

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eyes:

Hold eye open and rinse slowly and gently with water for 15-20

minutes.

Remove contact lenses, if present, after the first five minutes, then

continue rinsina.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 am to 4:30 pm Pacific Time (NPIC Web site; www.npic.orst.edu) for medical treatment information.

PRECAUTIONARY STATEMENT HAZARDS TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes or clothing, Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment wash water. Do not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without first notifying the sewage treatment plant authority. For guidance contact your Static Water board or Regional Office of the EPA.

Raymat Materials Inc.

440 Boulder Court, Suite 300, Pleasanton, CA 94F@er the Federal Insecticide, Fungicide,

and Rodenticide Act, as amended, for the

ACCEPTED MAR 3 0 7012

Net Contents: 55 lbs (25 Kg)

pesticide registered under.

EPA. Reg. No: 87931-3

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling

This product is for manufacturing use only. It is to be used for the formulation into growth regulator products for the following use: (a) livestock and their premises, for fly control.

STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal

STORAGE: Store in original container in a secure, dry storage area.

PESTICIDE DISPOSAL:: Wastes resulting from the use of this product may be disposed of

on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Nonrefillable container, Do not reuse or refill this container. Offer

for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into mixing equipment. Dispose of bag in a sanitary landfill, or by incineration, or if allowed by State and local authorities, by

burning. If burned, stay out of smoke.

WARRANTY

Raymat Materials Inc., warrants that this product conforms to the chemical description on the label. Raymat Materials Inc., neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, express or implied, concerning this product. To the extent consistent with applicable law Raymat Materials Inc's maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law buyer and user acknowledge and assume all risks and liabilities resulting from the handling, storage and use of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

J&T Associates LLC

Iain Weatherston Ph.D.

Director

623-217-9013 / 623-535-4055

E-mail: iweatherston@cox.net



February 25, 2013

John Hebert, Product Manager # 07) U.S. EPA – OPP – RD – IRB One Potomac Yard 2777 S. Crystal Drive Arlington, Virginia 22202

Subject:

Submission of Final Printed Labeling

Company:

Raymat Materials Inc., 440 Boulder Court, Suite 300

Pleasanton, CA 94566,

Contact:

Dr. Iain Weatherston, J&T Associates LLC.

[Contact information as per letterhead]

Product:

Diflubenzuron Technical [87931-3]

Dear Mr. Hebert:

As agent to Raymat Materials Inc., I am submitting as per the amendment approval letter of November 30, 2012, final printed labeling for the subject product.

In addition to two copies of the label and a fully executed pesticide application form [8570-1], also attached is a copy of the November 30, letter.

If you require further information or have any question I can be reached at iweatherston@cox.net or by telephone at 623-535-4055 or 623-217-9013 (cell).

lain Weatherston

Sincerely

DIFLUBENZURON TECHNICAL

ACTIVE INGREDIENT: INERT INGREDIENTS: _____2.54%

EPA Est. No. 89660-CHN-001 EPA Reg. No.: 87931-3

KEEP OUT OF REACH OF CHILDREN
NOT REVIEWED
In Accordance with PR Notice 82-2
CAUTION ed on Draft Labeling Dated This

FIRST AID

If on skin

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eyes

Hold eve open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue

rinsing.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center, doctor, or going for treatment, You may also call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm Pacific Time (NPIC Web site: www.npic.orst.edu for medical information.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin, or inhaled. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Avoid contact with eyes or clothing, Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated before reuse.

Manufactured for:

Raymat Materiais, Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566

Net Contents: 55 lbs (25 Kg)

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment wash water. Do not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR LISE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is for manufacturing use only. It is only to be used for the formulation into growth regulator products for the following use: (a) livestock and their premises, for fly control: (b) artichokes, barley, pats, triticale, wheat, citrus, cotton, grassland, leafy brassica and turnip greens, mushrooms, peanuts, pears, peppers, rice, soybeans, stone fruit (excluding cherries), treenuts, turfgrass; (c) nonfood uses; ornamentals, forestry, products for parasite control in ornamental fish ponds, aquatic noncrop sites e.g. products for mosquito/midge control and (d) uses for experimental purposes that are in compliance with U.S. EPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container in a secure, dry storage area.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue and into mixing equipment. Dispose of bag in a sanitary landfill, or by incineration, or if allowed State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

Raymat Materials. Inc., warrants that this product conforms to the chemical description on the label. Raymat Materials, Inc. neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, expressed or implied, concerning this product. To the extent consistent with applicable law Raymat Materials, Inc's maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law buyer and user acknowledge and assume all risks and liabilities resulting from handling, storage and of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.

BATCH CODE:

DIFLUBENZURON TECHNICAL

ACTIVE INGREDIENT:

EPA Reg. No.: 87931-3 EPA Est. No. 89660-CHN-001

KEEP OUT OF REACH OF CHILDREN NOT REVIEWED

CAUTION Deaft Labeling Dated

FIRST AID

If on skin

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eyes

Hold eye open and rinse slowly and gently with water for 15-20 minutes.

Remove contact lenses, if present, after the first 5 minutes, then continue

rinsing.

Call a poison control center or doctor for treatment advice.

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also call the National Pesticide Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30am to 4:30pm Pacific Time (NPIC Web site: www.npic.orst.edu for medical information.

PRECAUTIONARY STATEMENTS HAZARD TO HUMANS AND DOMESTIC ANIMALS

CAUTION

Harmful if absorbed through the skin. or inhaled. Causes moderate eye irritation. Do not get in eyes, on skin, or on clothing. Avoid contact with eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated before reuse.

Manufactured for:

Raymat Materiais, Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566

Net Contents: 55 lbs (25 Kg)

ENVIRONMENTAL HAZARDS

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment wash water. Do not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

This product is for manufacturing use only. It is only to be used for the formulation into growth regulator products for the following use: (a) livestock and their premises, for fly control; (b) artichokes, barley, oats, triticale, wheat, citrus, cotton, grassland, leafy brassica and turnip greens, mushrooms, peanuts, pears, peppers, rice, soybeans, stone fruit (excluding cherries), treenuts, turfgrass; (c) non-food uses; ornamentals, forestry, products for parasite control in ornamental fish ponds, aquatic non-crop sites e.g. products for mosquito/midge control and (d) uses for experimental purposes that are in compliance with U.S. EPA requirements.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

STORAGE: Store in original container in a secure, dry storage area.

PESTICIDE DISPOSAL: Wastes resulting from use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Non-refillable container. Do not reuse or refill this container. Offer for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue and into mixing equipment. Dispose of bag in a sanitary landfill, or by incineration, or if allowed State and local authorities, by burning. If burned, stay out of smoke.

WARRANTY

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BATCH CODE:

Please read instructions on a	reverse before comple	iting for <u>m.</u>		Forn	m Appro	oved.	OMB No.	2070-0080	Approval expires 2-28-9	
United States Environmental Protection Agen				Γ]	Registra	ition	OPP Identifier Number		
			ncv		—-	Amendr				
		ington, DC 20	_		-	_	Other		<u> </u>	
~~~~ <u>~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~</u>										
Application for Pesticide - Section I										
1. Company/Product Numbe	r			2. EPA Product	t Maneg	Jer		3. Pro	posed Classification	
87931-3				John Hebert				17	None Restricted	
4. Company/Product (Name)	4. Company/Product (Name)			PM#						
Raymat Materials Inc. I	Diflubenzuron Te	chnical		#07						
5. Name and Address of Ap	plicant <i>(Include ZIP Co</i>	ode)		6. Expedited Reveiw. In accordance with FIFRA Section 3(c)(3)						
Raymat Materials Inc., 44 Boulder Court, Suite 300 Pleasanton, CA 94566			00	(b)(i), my product is similar or identical in composition and labeling to:  EPA Reg. No						
				EPA Reg. N	lo					
Check if this	is a new address			Donalisas Mai						
				Product Nai	me	===				
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Amendment - Explair	below.			【✓】 Final p	orinted l	abels	in repsons	s to No	vember 30, 2012	
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IAIN WEATHERSTON		<u></u>	Consulta	int to Raymat Materials Inc.				623-535-4055		
Certification 6 Oete Application							, ,			
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complets.							Received			
l acknowledge that any knowlingly false or misleading statement may be punishable by fine or imprisonment or  both under applicable law.										
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# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND POLLL TION PREVENTION

# NOV 3 0 2012

Mr. Iain Weatherston Raymat Materials Inc. 440 Boulder Court, Suite 300 Pleasanton, CA 94566

Subject: Amended to Expand the Uses and Amend the Directions for Use

Diflubenzuron Technical EPA Reg. No. 87931-3

Your submission date: November 2, 2012

Dear Mr. Weatherston:

The labeling referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act as amended is acceptable. A stamped copy is enclosed for your records. Submit one copy of your final printed labeling before you release the product for shipment. If there are questions call Dani Daniel at 703 305-5409 or at daniel.dani@epa.gov.

- Herri

John Hebert

Product Manager (07)

Insecticide/Rodenticide Branch Registration Division (7505P)

Enclosure

# DIFLUBENZURONTECHNICAL

ACTIVE INGREDIENT:

Diflubenzuron (CAS# 35367-38-5)

97.46%

OTHER INGREDIENTS:

2.54%

EPA Reg. No 87931-3

EPA Est., No. XXXXX-XXX-XXX

# KEEP OUT OF REACH OF CHILDREN

# CAUTION

**FIRST AID** 

If on skin

Take off contaminated clothing.

Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

If in eyes:

Hold eye open and rinse slowly and gently with water for 15-20

minutes.

Remove contact lenses, if present, after the first five minutes, then

continue rinsina.

Call a poison control center or doctor for treatment advice.

## **HOT LINE NUMBER**

Have the product container or label with you when calling a poison control center, doctor, or going for treatment. You may also call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 am to 4:30 pm Pacific Time (NPIC Web site: www.npic.orst.edu) for medical treatment information.

## PRECAUTIONARY STATEMENT HAZARDS TO HUMANS AND DOMESTIC ANIMALS

## CAUTION

Harmful if absorbed through the skin. Causes moderate eye irritation. Avoid contact with eyes or clothing, Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

## **ENVIRONMENTAL HAZARDS**

This pesticide is toxic to aquatic invertebrates. Do not contaminate water when disposing of equipment wash water. Do not discharge effluent containing this product into any body of water unless the product is specifically identified and addressed in an NPDES permit. Do not discharge effluent containing this product into sewer systems without first notifying the sewage treatment plant authority. For guidance contact your Static Water board or Regional Office of the EPA.

Raymat Materials Inc.

ACCEPTED NOV 3 0 2012

440 Boulder Court, Suite 300, Pleasanton, CA 945 bader the Fadaral Insecticide, Fundicide. and Rodenticide Act, as amended, for the

pesticide registered under:

Net Contents: 55 lbs (25 Kg)

EPA. Reg. No: 8793/-3

#### DIRECTIONS FOR USE

## It is a violation of Federal law to use this product in a manner inconsistent with its labeling

This product is for manufacturing use only. It is only to be used for the formulation into insect growth regulator products for the following use (a) livestock and their premises, for fly control; (b) artichokes, barley, oats, triticale, wheat, citrus, cotton, grassland, leafy brassica and turnip greens, mushrooms, peanuts, pears, peppers, rice, soybeans, stone fruit (excluding cherries), treenuts, turfgrass; (c) non-food uses; ornamentals, forestry, products for parasite control in ornamental fish ponds, aquatic non-crop sites e.g. products for mosquito/midge control and (d) uses for experimental purposes that are in compliance with U.S. EPA requirements.

## STORAGE AND DISPOSAL

Do not contaminate water, food or feed by storage or disposal

STORAGE: Store in original container in a secure, dry storage area.

PESTICIDE DISPOSAL:: Wastes resulting from the use of this product may be disposed of

on site or at an approved waste disposal facility.

CONTAINER DISPOSAL: Nonrefillable container. Do not reuse or refill this container. Offer

for recycling if available. Completely empty bag by shaking and tapping sides and bottom to loosen clinging particles. Empty residue into mixing equipment. Dispose of bag in a sanitary landfill, or by incineration, or if allowed by State and local authorities, by

burning. If burned, stay out of smoke.

## WARRANTY

Raymat Materials Inc., warrants that this product conforms to the chemical description on the label. Raymat Materials Inc., neither makes nor authorizes any agent or representative to make any other warranty of fitness of merchantability, guarantee or representation, express or implied, concerning this product. To the extent consistent with applicable law Raymat Materials Inc's maximum liability for breach of this warranty shall not exceed the purchase price of the product. To the extent consistent with applicable law buyer and user acknowledge and assume all risks and liabilities resulting from the handling, storage and use of this product which extend beyond the use of this product under normal conditions in accord with the statements on this label.



RE: Question Iain Weatherston

to:

John Hebert 03/28/2012 05:12 PM

Hide Details

From: "Iain Weatherston" <i weatherston@cox.net>

To: John Hebert/DC/USEPA/US@EPA

History: This message has been replied to and forwarded.

1 Attachment



image001.gif

Thanks John, no further questions so far! Regards, Jain

From: John Hebert [mailto:Hebert.John@epamail.epa.gov]

Sent: Wednesday, March 28, 2012 1:54 PM

**To:** Iain Weatherston **Cc:** Dani Daniel

Subject: RE: Question

Hi lain - the alternate language you proposed is acceptable. Let me know if you have other questions.

John Hebert, PM7 Insecticide-Rodenticide Branch Registration Division Office of Pesticide Programs 703-308-6249 "lain Weatherston" ---03/28/2012 11:57:01 AM---Dani: Unfortunately, in this case the complete and identical verbiage from the

From: "lain Weatherston" <a href="www.net/sipendecox.net/">weatherston@cox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/sipendecox.net/si

Date: 03/28/2012 11:57 AM Subject: RE: Question

#### Dani:

Unfortunately, in this case the complete and identical verbiage from the Chemtura label cannot be used by my client since the uses of the Raymat technical material are being restricted to the stated animal health uses. Because of this restriction the exact verbiage cannot be used and so some form of paraphrasing, rephrasing, summarizing, restating or interpreting has to be done.

In yesterday's e-mail you wrote "I am not sure you can make that claim as it is without data to substantiate it. The label that you claim to be similar to does not make that claim in its Directions for Use. It is very different from your label."

The Chemtura Technical material, on the stamped approved label, is labeled for uses including "bolus, feed-through and premise treatments for fly control." This indicates that Chemtura or their predecessors furnished the Agency with data supporting this claim.

Since I cannot why when an approved product contains statements as the Chemtura label does, namely "only for formulation into an insecticide growth regulator for the following uses: (1) ......, bolus, feed-through and premise treatments for fly control" the Agency will not accept either my original verbiage namely "this product is for manufacturing-use only. It is to be used for the formulation into insect growth regulator products for the following use (a) domestic animals and their man-made premises."

This would be my preferred language however I can understand if the Agency finds this overly broad.

My alternate verbiage, as sent to you recently is: "The product is for manufacturing use only: It is only to be used for the formulation into insect growth regulator products for feed-through and premise treatments for fly control" addresses these concerns

The only other concession that I am willing to make is to use the verbiage "This product is for manufacturing-use only. It is to be used for the formulation into insect growth regulator products for the following use (a) livestock and their premises for fly control."

If the PM or the label reviewer is not satisfied with this choice of verbiage then I would appreciate a letter explaining in detail why this verbiage is not acceptable.

Regards,

lain

From: Dani Daniel [mailto:Dani@epamail.epa.gov]

Sent: Wednesday, March 28, 2012 3:11 AM

To: Iain Weatherston
Subject: RE: Ouestion

lain:

The problem being you can not paraphrase. We you paraphrase something is left out. Now I do not know who you talked to but it was not me. I suggest that you complete the statement. It is not me who is asking the question. I am satisfied with the label, but it is not me who sign off of it.

Dani

End Use (EP) or Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGAI). Must submit Group A and B product chemistry data for each proposed product unless it's a 100% identical (repack): YES or NO (circle one)

Guideline	Group A: Product Chemistry Data	EP Do Subn	ata nitted	MP D Subm		TGAI	
No.	Study Title	Yes	No	Yes	No	Yes	No
830.1550	Product Identity & Composition			T			
830.1600	Description of materials used to produce the product					V	
830.1650	Description of formulation process						
830.1670	Discussion on the formation of impurities				Γ -		i ——
830.1700	Preliminary analysis						
830.1750	Certified limits (158.345)		1			1	
830.1800	Enforcement analytical method					<u> </u>	

PER PER

Guideline	Group B: Product Chemistry Data Study	EP Data Submitted		MP D Subn	ata nitted	7GAI	
No.	Title	Yes	No	Yes	No	Yes	No
830.6302	Color			1			
830.6303	Physical State			1			
830.6304	Odor	Ţ		T		1_1/	
830.6313	Stability to normal and elevated temperatures metal and metal ions			, .		V	
830.6314	Oxidation/Reduction [Chemical incompatibility]	ļ 		<u> </u>		V	
830.6315	Flammability	<u> </u>	<u> </u>	<u> </u>	<u> </u>	V .	
830.6316	Explodability		<u> </u>	<u> </u>	<u> </u>	V	
830.6317	Storage stability	<u> </u>	<u> </u>		<u> </u>	<u> </u>	
830.6319	Miscibility	<u> </u>					
830.6320	Corrosion Characteristics	<u></u> _			<u> </u>	<u> </u>	
830.6321	Dielectric Breakdown Voltage	<u> </u>	<u> </u>				<u> </u>
830.7000	Нд		<u> </u>	<u> </u>	<u> </u>		
830.7050	UV/ Visible Absorption						
830.7100	Viscosity					1/	
830.7200	Melting Point						
830.7220	Boiling Point						
830.7300	Density	<u> </u>	<u> </u>		<u> </u>	1 4	
830.7370	Dissociation Constant						<u> </u>
830.7550	Partition Coefficient						
830.7840	Water Solubility						/
830.7950	Vapor Pressure						

Grayed out = data not required

#### R 310

New products must either: 1) supply the product specific acute toxicity 6 pack data (listed below), or 2) provide a bridging rationale document. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline	Acute toxicity (6 pack)	Data submitted		Cite	ed
No.	Study Title	Yes	No	Yes	No_
870.1100	Acute Oral (LD50)		$\Lambda$	7	
870.1200	Acute Dermal (LD50)			1	 
870.1300	Acute Inhalation (LC50)		1_X	154 	 
870.2400	Acute Eye Initation				
870.2500	Acute Dermal Irritation			1 2	
870.2600	Dermal Sensitization		<u> </u>	1	ļ

Efficacy - which guideline is used depends on the proposed label use

Guideline		Data submitted		Cited		
No.	Study Title	Yes	No	Yes	No	Comments
810.3100	Soil Treatments for Imported Fire Ants	ļ				
810.3200	Livestock, Poultry, Fur and Wool-Bearing Animal Treatments					A6
	Treatments to Control Pests of Humans and					U
810.3300	Pets			1	<u> </u>	\ \ _ \
810.3400	Mosquito, Black Fly, and Biting Midge (Sand Fly) Treatments					
810.3500	Premises Treatments		<u> </u>			
810.3600	Structural Treatments					
810.3800	Methods for Efficacy Testing of Termite Baits					



### UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, D.C. 20460

September 12, 2011

OFFICE OF PREVENTION, PESTICIDES AND TOXIC SUBSTANCES

OPP Decision Number: D-454494

EPA File Symbol or Registration Number: 87931-G Product Name: DIFLUBENZURON TECHNICAL

EPA Receipt Date: 09-Sep-2011 EPA Company Number: 87931

Company Name: RAYMAT MATERIALS INC.

IAIN WEATHERSTON, PH.D. J&T ASSOCIIATES LLC RAYMAT MATERIALS INC. 4061 NORTH 156TH DRIVE GOODYEAR, AZ 85395-

SUBJECT: Receipt of Application and 75% Small Business Waiver Request

#### Dear Registrant:

The Office of Pesticide Programs has received your application, 75% small business waiver request, and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R310 NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If your waiver request is approved, the decision review time period will start on the date of approval. If your waiver request is denied, you will receive an invoice for the outstanding balance.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely,

Front End Processing Staff

Information Technology & Resources Management Division

#### Iain Weatherston

rom:

paygovadmin@mail.doc.twai.gov Sunday, August 28, 2011 10:01 PM

ent: To:

iweatherston@cox.net

Subject:

Pay.Gov Payment Confirmation

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

Transaction Summary

Application Name: PRIA Service Fees

Pay.gov Tracking ID: 254A31B4 Agency Tracking ID: 74232989029

Transaction Type: Sale

Transaction Date: Aug 29, 2011 1:00:43 AM

Account Holder Name: IAIN WEATHERSTON

Transaction Amount: \$1,202.00

Billing Address: 4061 N. 156th Drive

City: Goodyear State/Province: AZ Zip/Postal Code: 85395

Country: USA

Card Type: MasterCard

Card Number: *********4562

Decision Number:

Registration Number: 87931-G

Company Name: Raymat Materials Inc.

Company Number: 87931 Action Code: R310

United States Environmental Protection Washington, DC 20460	Agency	✓ Registration Amendment Other	OPP Identifier Number
	for Pesticide - Secti		
1. Company/Product Number 87391-G	2. EPA Product Manag	ger 3. Pr	roposed Classification
<del></del>	Dris Benmhend	[ <b>/</b>	None Restricted
4. Company/Product (Name) Raymat Materials Inc. DIFLUBENZURON TECHNICAL	PM# 1		
5. Name and Address of Applicant (Include ZIP Code)		eiw. In accordance with	
Raymat Mateials Inc., 440 Boulder Court, Suite 300, Pleasanton, CA 94566	to:	s similar or identical in co	-
Check if this is a new address	Product Name		
	Section - II		
	r 1		
Amendment - Explain below.	Final printed Agency lette	labels in repsonse to	
Resubmission in response to Agency letter dated	Me Too" Ap		
Notification - Explain below.	Other - Expla	in below.	
Explanation: Use additional page(s) if necessary. (For section I a PRIA category R310 Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.00 (25%) of R310 fee. Small business waiver application Pre-paid \$ 1202.		g 75%	
	Section - III		
1. Material This Product Will Be Packaged In:		<del></del>	
	Water Soluble Packaging	2. Type of Container	•
Yes Yes	Yes	Metal	
V No No	✓ No	Glass	
	f "Yes" No. per Packaga wgt container	Paper Other (S	Specify)
3. Location of Net Contents Information 4. Size(s) Retail C		5. Location of Label Direction	
	5 lb (25 Kg)	- Cocation of Caboti Singular	лıs
6. Manner in Which Label is Affixed to Product    Jithograph   Paper give   Stenciled	Other		
	Section - IV		·
1. Contact Point (Complete items directly below for identification of	<del></del>	f necessary, to process this	: boolication.)
Name Title			⊌ No. (Include Area Code)
	nsuitant to Raymat Material	•	
Certification I certify that the statements I have made on this form and all a lacknowledge that any knowlingly false or misleading statements both under applicable law.	attachments thereto are true,	•	6. Date Application Received (Stamped)
2 "gnaturo gin Wenter 3. To	itle nsultant to Raymat Materials In	ic.	
4. Typed Name 5. D.	ate		
IAIN WEATHERSTON	September 6,	, 2011	}



#### J&T Associate LC

4061 North 156th Drive, Goodyear, AZ 85395

lain Weatherston, Ph.D.

Director

623-535-4055/623-317-9013

E-mail: iweatherston@cox.net

Driss Benmhend Acting Product Manager, Team 1 U.S. EPA – OPP - RD - IRB One Potomac Yard 2777 South Crystal Drive Arlington, VA 22202 September 5, 2011

SUBJECT:

Application to register Diflubenzuron Technical.

COMPANY:

Raymat Materials Inc., 440 Boulder Court, Suite 300, Pleasanton,

California, 94566.

CONTACT:

lain Weatherston [contact details as per letterhead]

PRODUCT:

Diflubenzuron Technical [87931-G]

a comparison of the control of the Bross which

PRIA Category:

R310

Dear Mr. Benmhend;

As agent for, and on behalf of Raymat Materials Inc., I am submitting for your review and approval an application to register Diflubenzuron Technical.

Raymat Materials Inc., is submitting a complete product chemistry package (OPPTS 830 series) but all other guideline requirements are being supported by the use of the "cite-all" method of data support. The application is classified as R310 with a review time of 6 months and a PRIA fee of \$4,807. Raymat has filed a SB Waiver request for a waiver of 75% of the fee. In the meantime the remaining 25% (\$1,202) has been prepaid (see pay.gov. payment confirmation below).

Besides this letter, this volume [VOLUME 87391-G-1] contains:

- Application for pesticide registration [Form 8570] fully executed.
- Pay.gov. pre-payment confirmation
- Certification with respect to citation of data [Form 8570-34] indicating the use of the "cite-all" option under the selective method. A full product chemistry package [OPPTS Series 830] is being submitted but all other required guidelines are supported under the "cite-all option. The data matrix [Form 8570-35] contains the names and addresses of the 17 organizations listed in the March 31, 2011 Data Submitters List as having submitted data in support of diffubenzuron products.
- Data Matrix [Form 8570-35] fully executed.
- Draft label (five copies) one bound into this volume and four others loose.
   Confidential Statement of Formula.

In addition to this volume, the application is comprised of:

VOLUME 87391-G-2

Product Chemistry: Group A & Physical/Chemical Characteristics.

VOLUME 87391-G-3 Product Chemistry: Preliminary Analysis and Enforcement

Analytical Method

VOLUME 87391-G-4 Product Chemistry: Physical Properties: UV/Visible Absorption of

Diflubenzuron Technical.

If there are any questions, or further information is required please do not hesitate to contact me directly at <a href="mailto:iweatherston@cox.net">iweatherston@cox.net</a> or by telephone at 623-535-4055.

Sincerely,

lain Weatherston

Consultant to Raymat Materials Inc.

#### TRANSMITTAL DOCUMENT

#### NAME & ADDRESS OF APPLICANT

Raymat Materials Inc. 440 Boulder Court, Suite 300 Pleasanton, California 94566

#### REGULATORY ACTION IN SUPPORT OF WHICH THIS PACKAGE IS SUBMITTED

APPLICATION TO REGISTER DIFLUBENZURON TECHNICAL

TRANSMITTAL DATE

September 6,, 2011

#### LIST OF SUBMITTED MATERIAL

VOLUME 87931-G-1 Administrative Materials, Correspondence, Application, Label and Confidential statement of Formula

VOLUME 87931-G-2 Product Chemistry: Group A & Physical/Chemical

Characteristics

VOLUME 87931-G-3 Product Chemistry: Preliminary Analysis and Enforcement

Analytical Method

VOLUME 87931-G-4 Product Chemistry: Physical Properties; UV/Visible

Absorption of Diflubenzuron

#### **PRIA INFORMATION**

PRIA Category F

R310

Agency Tracking ID 74232989029

Pay.gov Tracking ID 254A31B4

#### COMPANY NAME

Raymat Materials Inc. 440 Boulder Court, Suite 300 Pleasanton, California 94566

#### COMPANY AGENT/CONTACT

Iain Weatherston, Ph.D. J&T Associates LLC

4061 N. 156th Drive, Goodyear, AZ 85395

iweatherston@cox.net 623-535-4055

in Weathert

AGENT SIGNATURE

September 6, 2011

Form Approved OMB Nos. 20 / u-0060; 2070-0057; 2070-0107; 2070-0122; 2070-0164



# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

			a Avenue, N.V , D.C. 20460	V.
and 0.25 hours per response comments regarding burden	totice: The public reporting burden for this collector reregistration and special review activities, in estimate or any other aspect of this collection of U.S. Environmental Protection Agency, 1200 Po	cluding time for re information, inclu	ading the instruction fing suggestions for	s and completing the necessary forms. Send reducing the burden to: Director, Collection
	Certification with	Respect to C	itation of Data	
• • • • • • • • • • • • • • • • • • • •	ame, Address, and Telephone Number 10 Boulder Court, #300, Pleasanton, CA 94	566 6230535-40	)55 (Agent)	EPA Registration Number/File Symbol 87391-G
Active Ingredient(s) and/or Diffubenzuron [108201]	r representative test compound(s)			Date September 6, 2011
·	st all those claimed for this product using 40 formulate products for pets & domestic ani	-	nade premises)	Product Name DIFLUBENZURON TECHNICAL
	is a 100% repackaging of another purchase st submit the Formulator's Exemption Staten			r all the same uses on your label, you do not need to
l am responding be used for this p		with this form a li	st of companies se	nt offers of compensation (the Data Matrix form should
	SECTION I: METHOD O	F DATA SUPPO	ORT (Check one m	ethod only)
	e-all method of support, and have included was sent offers of compensation (the Data Mater this purpose).		✓ under the	g the selective method of support (or cite-all option selective method), and have included with this form a d list of data requirements (the Data Matrix form must be
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<u> </u>	-all method or when using the cite-all option agree to pay compensation, to other persons			· · · · ·
	SECT	TION JII: CERTIF	ICATION	
application for registration, indicated in Section I, this substantially similar production.	the form for reregistration, or the Data-Call- application is supported by all data in the Ag ct, or one or more of the ingredients in this pi	In response. In a gency's files that roduct; and (2) is	addition, if the cite⊲ (1) concern the pro a type of data that	onse is supported by all data submitted or cited in the all option or cite-all option under the selective method is perties or effects of this product or an identical or would be required to be submitted under the data tion of a product of identical or similar composition and
I certify that for the written permission of the	each exclusive use study cited in support of he original data submitter to cite that study.	this registration o	or reregistration, the	at I am the original data submitter or that I have obtained
submitter; (b) I have obtain compensation have expire offered (l) to pay compens	ned the permission of the original data subm ad for the study; (d) the study is in the public l	itter to use the st literature; or (e) I (1)(F) and/or 3(c)	udy in support of the have notified in wri	fusive use study, either: (a) I am the original data nis application; (c) all periods of eligibility for ting the company that submitted the study and have nd (ii) to commence negotiations to determine the
accordance with sections	3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are ava	ailable and will be	e submitted to the A	ny compensation and evidence of their delivery in Agency upon request. Should I fail to produce such suspend the registration of my product in conformity with
i certify that th knowingly false or misia	e statements I have made on this form a eading statement may be punishable by f	nd all attachme Ine or imprison	nts to it are true, ment or both und	accurate, and complete. I acknowledge that any ler applicable law.
ıgnature	edustical inst		Date Sept. 6, 2011	Typed or Printed Name and Title lain Weatherston, Agent to Raymat Materials.

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.

# PRIA 2 – 21 Day Content Screen Review Worksheet (EPA/OPP Use Only) 3/23/09

		3123107		
21 Day Screen Start Date:	<u>9-8</u>	-//		_
Experts In-Processing Signature:	MF	HARRINGTON	Date 9-12-11	Fee Paid: Yes 🗸
Division management contacted or				·

Items for 1	Review			Yes	No	N/A*		
Application Form (EPA Form 8570-1)(link to form) signed & complete including package type								
	•	signed, a	nd	X				
including fragrances, approved i	for the proposed uses (see	yes /	no		41), iii			
Certification with Respect to Citatio	on of Data (EPA Form 8570	0-34) (L	ink to	X				
Certificate and data matrix consistent				X				
* 1	•	yes	no		i I			
Formulator's Exemption Statement completed and signed (N/A if source is	(EPA Form 8570-27) (Link	to forn				<u> </u>		
Data Matrix (EPA Form 8570-35) (Li	•		nal	$\chi$				
a) Selective Method (Fee category ex	perts use)	yes .	no					
b) Cite-All (Fee category experts use)								
c) Applicant owns all data (Fee categ	gory experts use)							
	Application Form (EPA Form 8570-including package type  Confidential Statement of Formula dated (EPA Form 8570-4) (Link to form a) All inerts (link to http://www.epaincluding fragrances, approved Footnote A) Active of March (N/A if 10 Certification with Respect to Citation form) completed and signed (N/A if 10 Certificate and data matrix consistent  If applicant is relying on data that are to pay statement included. (see Footnote If applicable, is there a letter of Author Formulator's Exemption Statement completed and signed (N/A if source is technical)  Data Matrix (EPA Form 8570-35) (Lopies (PR 98-5) (Link to PR 98-5) corepack)  a) Selective Method (Fee category experts use	Confidential Statement of Formula all boxes completed, forms dated (EPA Form 8570-4) (Link to form)  a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A) Achievilary (EPA Form 8576 form) completed and signed (N/A if 100% repack)  Certification with Respect to Citation of Data (EPA Form 8576 form) completed and signed (N/A if 100% repack)  Certificate and data matrix consistent  If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)  If applicable, is there a letter of Authorization for exclusive use of Formulator's Exemption Statement (EPA Form 8570-27) (Link completed and signed (N/A if source is unregistered or applicant etechnical)  Data Matrix (EPA Form 8570-35) (Link to form) both internal acopies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if repack)  a) Selective Method (Fee category experts use)	Application Form (EPA Form 8570-1)(link to form) signed & complete including package type  Confidential Statement of Formula all boxes completed, form signed, a dated (EPA Form 8570-4) (Link to form)  a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A) Achievatives only.  Certification with Respect to Citation of Data (EPA Form 8570-34) (L form) completed and signed (N/A if 100% repack)  Certificate and data matrix consistent  If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)  If applicable, is there a letter of Authorization for exclusive use only.  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7	Is the data package consistent with PR Notice 86-5 (link to PRN 86-5)	X	
8	Notice of Filing (link to <a href="http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm">http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm</a> ) included with petitions (link to <a href="http://www.epa.gov/pesticides/regulating/tolerances.htm">http://www.epa.gov/pesticides/regulating/tolerances.htm</a> )		$\times$
9	If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)		X
10	Required Data (link to <a href="http://www.epa.gov/pesticides/regulating/data_requirements.htm">http://www.epa.gov/pesticides/regulating/data_requirements.htm</a> ) and/or data waivers. See Footnote C.  a) List study (or studies) not included with application		

#### **Comments:**

Two gan delines on the R310 checklist are addressed by permission/
PER: Preliminary analysis and endowment analysis and endowment analysis and endowment analysis Says All Ahar
After product chom, the data modifix Says All Ahar
data requirements are satisfied by the cite all method of
data support." Neither toxicity for efficiency gaidelines are
data support." Neither toxicity for efficiency gaidelines are
listed out specifically. We leave it to the PM to
de cide how to proceed.

Active timporties only - no inerts for review.

The Ket passed.

Studies passed 86-Steview. MRID ARS969

al^{21/11}

* N/A - Not Applicable

#### Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to <a href="http://www.epa.gov/opprd001/inerts/lists.html">http://www.epa.gov/opprd001/inerts/lists.html</a>] and if the inert is not approved, to obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at <a href="mailto:inertsbranch@epa.gov">inertsbranch@epa.gov</a> and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to <a href="http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm">http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm</a>].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to <a href="http://www.epa.gov/opprd001/inerts/tips.pdf">http://www.epa.gov/opprd001/inerts/tips.pdf</a>] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

#### Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

- Correct the application by, for instance, correcting the inert's identity or CAS
  number, providing documentation that the inert has been approved, or
  removing the unapproved inert from the CSF or replacing it with one that is
  approved for the application's uses; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

#### Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

- Correct the application by, for instance, correcting the inert's identity or CAS
  number, providing documentation that the inert has been approved, or
  removing the unapproved inert from the CSF or replacing it with one that is
  approved for the application's uses; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)
- 3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

#### PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

- Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
- 2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

- B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.
- C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.



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	DAT	A MATRIX			
Date 9/2/2011 EPA Reg No./File Symbol 87931-G  Applicant's/Registrant's Name & Address Raymat Materials Inc., 440 Boulder Court, Suite 300, Pleasanton, CA 94566 DIFLUBENZURON TECHNICAL			EPA Reg No./File Symbol 87931-G	Page 1 of 4	
Ingredient Diflubenzuron (108201	)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830,1550	Product identity and composition		Raymat Mateials Inc.	Own	this submission
830,1600	Description of starting materials used to produce product		Raymat Materials Inc.	Own	this submission
830,1620	Description of production process		Raymat Materials Inc.	Own	this submission
830,1670	Discussion of formation of impurities		Raymat Materials Inc.	Own	this submission
830.1700	Preliminary analysis		Raymat Materials Inc.	Per	this submission
830.1750	Certified limits		Raymat Materials Inc.	Own	this submission
830,1800	Enforcement analytical method		Raymat Materials Inc.	Per	this submission
830,6302	Color		Raymat Materials Inc.	Own	this submission
830.6303	Physical state		Raymat Materials Inc.	Own	this submission
830.6304	Odor		Raymat Materials Inc.	Own	this submission
830,6313	Stability to temperature and metals, metal ions	Ţ <u> </u>	Raymat Materials Inc.	Own	this submission
830.6314	Oxidation/reduction - chemical compatability	<u> </u>	Raymat Materials Inc.	Own	this submission
830.6315	Flammability		Raymat Materials Inc.	Own	this submission
830.6316	Explodability		Raymat Materials Inc.	Own	this submission
830.6317	Storage stability	in progress	Raymat Materials Inc.	Own	PTRL West
Signature	in Wenthers .	<del></del>	Name and Title Iain Weatherston, Consultant to Raymat Mate	rials	Date 09/02/2011



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Date 9/2/2011 EPA Reg No./File Symbol 87931-G  Applicant's/Registrant's Name & Address Raymat Materials Inc., 440 Soulder Court, Suite 300, Pleasanton, CA 94566 DIFLUBENZURON TECHNICAL		EPA Reg No./File Symbol 87931-G	Page 2 of 4		
Ingredient Diflubenzuron (108201)					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6319	Miscibility		Raymat Mateials Inc.	Own	this submission
830.6320	Corrosiion characteristics	in progress	Raymat Materials Inc.	Own	PTRL West
830.6321	Dielectric breakdown constant		Raymat Materials Inc.	Own	this submission
830.7000	рН		Raymat Materials Inc.	Own	this submission
830,7050	UV/Visible absorption		Raymat Materials Inc.	Own	this submission
830,7100	Viscosity		Raymat Materials Inc.	Own	this submission
830,7200	Melting point/range		Raymat Materials Inc.	Own	this submission
830,7220	Boiling point/range		Raymat Materials Inc.	Own	this submission
830.7300	Density, relative density, specific gravity		Raymat Materials Inc.	Own	this submission
830.7370	Dissociation constant		Raymat Materials Inc.	Own	this submission
830,7520	Particle size, fiber length & diameter distribution		Raymat Materials Inc.	Own	this submission
830.7550/7560/7570	Partition coefficient		Raymat Materials Inc.	Own	this submission
830.7854/7860	Water solubility		Raymat Materials Inc.	Own	this submission
830.7950	Vapor pressure		Raymat Materials Inc.	Own	this submission
	7.				
Signature	Weatherstea.		Name and Tiffe Iain Weatherston, Consultant to Raymat M	aterials	Date 09/02/2011

EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.

Agency Internal Use Copy



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DATA MATRIX

	DA'	TA MATRIX								
Date 9/2/2011			EPA Reg No./File Symbol 87931-G	Page 3 of 4						
Applicant's/Registrant's Name & Address Raymat Materials Inc., 440 Boulder Court, Suite 300, Pleasanton, CA 94566			Product DIFLUBENZURON TECHNICAL							
Ingredient Diflubenzuron (108201)										
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note					
	ALL OTHER DATA REQUIREMENTS ARE SATSFIED	BY THE	"CITE-ALL" METHOD OF DATA SUPPORT							
COMPANY NUMBER										
270	FARNAM COMPANIES INC.		301 WEST OSBORN, PHOENIX	AZ	85013					
352	E.I. DU PONT DE NEMOURS & CO., INC.		1007 MARKET STREET, WILMINGTON	DE	19898					
400	CHEMTURA CORPORATION		199 BENSON ROAD (2-5), MIDDLEBURY	СТ	06749					
499	WHITMIRE MICROGEN RESEARCH LABORATORY		3568 TREE COURT IND. BLVD ST. LOUIS	мо	63122					
2724	WELMARK INTERNATIONAL		3501 E. WOODFIELD ROAD #200W,							
			SCHAUMBERG	ľL.	60173					
4691	BOEHRINGER (NGLEHEIM VETMEDICA INC		P.O. B 338, 520 S15TH STREET, ELWOOD	кs	66024					
8709	MARS FISHCARE NORTH AMERICA, INC.		POB 1014, 102.5 SOUTH CHAUNCY ST.	Ţ <u></u>						
		T	COLUMBIA CITY	IN	46725					
46946	THE AGRICULTURE & NUTRITION COMPANY	<del>                                     </del>	5220 SPEAKER ROAD, KANSAS	KS	66106					
66607	SPRAY DRIFT TASK FORCE	<u></u>	1900 M STREET, NW, WASHINGTON	DC	20006					
71754	OUTDOOR RESIDENTIAL EXPOSURE TASK FORCE		1350   STREET NW., WASHINGTON	DC	20005					
71755	AGRICULTURAL REENTRY TASK FORCE	<u> </u>	N1350 I STREET NW., WASHINGTON	рс	20005					
Signature	in Warthow Chi		Name and Title Iain Weatherston, Consultant to Raymat Mate	rials	Date 09/02/2011					



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Date 9/2/2011  Applicant's/Registrant's Name & Address  Raymat Materials Inc., 440 Boulder Court, Suite 300, Pleasanton, CA 94566			EPA Reg No./File Symbol 87931-G		Page 4 of 4
			Product DIFLUBENZURON TECHNICAL		
Ingredient Diflubenzuron (108201	1)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
	ALL OTHER DATA REQUIREMENTS ARE SATSFIED	BY THE	"CITE-ALL" METHOD OF DATA SUPPORT		
COMPANY NUMBER				1 -	
73766	INNOVATIVE PEST CONTROL PRODUCTS		P/O. BOX 880216, BOCA RATON	FL	33488
73989	FIFRA ENDANGERED SPECIES TASK FORCE		1350 I STREET, NW, WASHINGTON	DC	20005
75234	AGRICUKTURAL HANDLERS EXPOSURE TASK FORC		POB 509, 1720 PROSPECT DRIVE,	Ţ <u> </u>	T
			MACON	МО	63552
75313	HOMEGUARD DISTRIBUTORS INC.		12597 ULMERTON ROAD, LARGO	FL.	33774
85678	REDEAGLE INTERNATIONAL LLC		POB 640, 7460 LANCASTER PIKE , SUITE 9		
			HOCKESSIN	DE	19707
85905	CHAMPION FARMOQUIMICO LTDA		4061 N 156th DRIVE, GOODYEAR	AZ	85395
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		Ţ <u> </u>			
					<del> </del>
				<del>                                     </del>	<del> </del>
		<b> </b>	<del>                                     </del>	<del>                                     </del>	<u> </u>
Signature air Desturca.		<del>,</del>	Name and Title fain Weatherston, Consultant to Raymat Materials		Date 09/02/2011

### **CONFIDENTIALITY CLAIMS**

#### STATEMENT OF DATA CONFIDENTIALITY

Information claimed confidential on the basis of its falling within the scope of FIFRA § 10(d)(1) (A), (B) or (C) has been removed to a confidential attachment and is cited by cross-reference number in the body of the text.

COMPANY: Raymat Materials Inc.

COMPANY AGENT: lain Weatherston, Ph.D.

TITLE: Consultant to Raymat Materials Inc.

DATE: September 6, 2011

SIGNATURE:



### **GOOD LABORATORY PRACTICES STATEMENT**

The purpose and scope of this report do not fall under the requirements of 40 CFR 160.

lain Weatherston

For applicant and submitter

September 6, 2011

Date

## 21-Day Screen Completed by Contractor

21-Day Expires on  $9^{-29-11}$ 

Jacket # 87931-G MRID# 485969

Content Screen: Recommend to Pass/Fail

86-5 Review: Pass/Fail/NA

Overall Status: Recommend to Pass/Fail

Transfer This Jacket to:

STEPHEN SCHABGE
PM-1

